
ICANN Transcription

Registration Data Accuracy Scoping Team

Thursday, 17 February 2022 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. Attendance and recordings of the call are posted on agenda wiki page: <https://community.icann.org/x/4D3Cg>

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

TERRI AGNEW:

Good morning, good afternoon, and good evening and welcome to the Registration Data Accuracy Scoping Team, taking place on Thursday, the 17th of February 2022 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're only on the telephone, could you please identify yourself now?

Hearing no one, we do have listed apologies from Toba Obaniyi.

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

Seeing or hearing no one, if you do need assistance, please email the GNSO secretariat. All members will be promoted to panelists for today's call. Members, when using chat, please select

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.

everyone in order for all to see the chat. Observers will have view only to the chat access.

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

As a reminder, those who take part in ICANN multi-stakeholder process are to comply with Expected Standards of Behavior.

With this, I'll turn it back over to our chair, Michael Palage. Please begin.

MICHAEL PALAGE:

Thank you very much. Good morning, good afternoon, and good evening, everyone. Just wanting to again give a quick update, an administrative update.

I was just speaking with our ICANN Org colleagues. Today the order of our remaining homework will be NCSG, GAC, and then the BC. I believe we are still missing SSAC and the ISP responses for the gap analysis.

Additionally, one of the other things that I would like to discuss with everyone, at least put a pin on this perhaps for further discussion next week, is what is going to be our approach for the upcoming ICANN73 meeting. My proposal would be to make it a working meeting, much like ICANN72. I think that would probably make the best use of our time. And since we are a little behind schedule, that would perhaps allow us to wrap up assignment one and two.

I know we are close and I would like to use all of the next couple of meetings to try to put a bow on that and get to that important intersection between assignments one and two, and assignments three and four.

I'm going to pause there. Does anyone have any objections to that proposal? I just want to get this thing so I can keep track of hands. I see one hand. I see two hands. Lori, I see your hand, and I understand from your message we only have you for the first 30 minutes, so please go first.

LORI SCHULMAN:

Thank you, Michael. I think a working meeting makes sense. However, I think, to serve the community, I would like to see part of that meeting be a report out—not all the meeting, but maybe the first 10-15 minutes, just to give the community an update. Then if people want to stay and observe the work, I think that's reasonable.

The second point I wanted to make, again no problem with a working meeting, but keeping in mind with homework assignments, that we will be doing prep for a whole bunch of meetings that week and I just wanted to level set. On our side of the bench, we've been having problems getting the homework done timely as it is and I just see another challenge doing all of the prep that we'll be doing in the next coming weeks.

MICHAEL PALAGE:

Thank you for that, Lori. Alan Greenberg, you have the floor.

ALAN GREENBERG: Thank you. Just a very brief question for clarity. Are we talking about doing it in the regular timeslot or a timeslot within the meeting schedule?

MICHAEL PALAGE: No, we will be doing it in the time that we have been allotted. Do we know that time slot just yet? I'm sorry. Marie, have we had that confirmed yet? Or Terri.

MARIKA KONINGS: This is Marika. I posted that in the chat as well. It's scheduled for a Monday, the 7th of March at 16:30 UTC. I believe it is for 90 minutes. And we do not have a regular meeting scheduled for that week because it would conflict with I think a bunch of other ICANN sessions.

ALAN GREENBERG: Okay, thank you. Sorry. I didn't notice that.

MICHAEL PALAGE: Nor did I. And thank you, Marika, for having that quickly at hand. Okay. With that ... Oh, one other quick assignment that I would like. One of the things that I definitely would like to wrap up next week, Marika posted or compiled with her ICANN Org colleagues the working definitions/explanation of accuracy. And what she also did is that document also augmented the responses from ICANN Compliance. And it's on the screen right now.

So, what I would like to do is, since assignment one is so critical to a lot of our remaining work, particularly assignment two, gap analysis, we really need to come back to this and wrap this up.

So this is going to be a priority for next week. I just want to highlight that for everyone. I think the augmentation by Compliance I think helps provide ... I actually think they did a pretty good job of almost doing a gap analysis of what the current definition/explanation is, yet some of the stuff that they do and don't do. So again, I would encourage everyone to read that document, and if you do have any questions or concerns, to put that in the form that staff or ICANN Org colleagues have provided there.

Again, I don't think this should be that difficult. I don't know if it would even be necessary for each individual stakeholder group to come up with their own formulation. This is something, based upon the first work we did in this area, if the registries and registrars could collaborate, I think they're generally going to have one position and then I know the BC, IPC, GAC and ALAC had been tending to have a different view. Where the NCSG comes down on this, I don't know. But if you can perhaps work intersessionally on this assignment, it would be incredibly helpful so that we could wrap this up next week.

And with that, I will end the administrative update and we will go back to our current work. And I believe first up is Sarah, I see your hand up. Or I was reminded that your hand was up. You have the floor.

SARAH WYLD: Yeah. Thank you. Hi. This is Sarah. Good morning. I just wanted thank you for putting together—or thank the staff team for putting together that document. Always, of course, very helpful to see things laid out clearly all in one place.

I guess I wanted to share some first impressions about the response from the staff team or what ICANN Org provided, which is this is super useful information.

For myself, I don't think that it would then promote or prompt updates to the definition, because it's important I think to keep in mind the difference between a definition of something and then how that thing is actualized into real life. I don't know. Words are hard early in the morning.

So, in the registrar proposed definition, the first paragraph is what I would say is actually the definition. And then the second and third paragraph are how does that actually work in real life.

I think, based on that, based on my understanding, I wouldn't see changed that need to come from the input, from ICANN, because I think that input is already accommodated sufficiently. Okay, thank you.

MICHAEL PALAGE: Okay. And thank you for getting a head start on that. And hopefully, if the rest of your registry and registrar ... If the rest of the registry and registrar colleagues agree with that, hopefully that will make that discussion go quickly next week and then we will wait to see if there are any other feedback from those that might have a different assignment or a different perspective.

But to your point there, Sarah, I do think having this will help crystalize a lot of the gap discussion and gap analysis as to what is currently in the contract, how Compliance has gone about following that guidance and where there may be the need for future change or future clarification.

With that, I see no further hands up. Stephanie, who will be presenting for the NCSG?

MANJU CHEN: I think Stephanie is not here so I'm going to present on behalf of NCSG.

MICHAEL PALAGE: Manju, thank you very much. You have the floor, Manju.

MANJU CHEN: For us, because this form, the title of this form is how and by whom can it measure, whether current goals of the existing accuracy requirement are met, we are asked to answer the questions in this form of from whom to gather information. So it's kind of unclear for us how answering this question can achieve answering the question of measurement. And we think that the team really needs further discussions to clarify and agree on what exactly the current goals of existing accuracy requirements means before we can tackle the question of measurements.

But that said, to the question of from where to gather information, we suggest that first registrars might voluntary share the process

and results of their accuracy measurement. However, we know that ... I mean, since there are no contractual or legal [inaudible] for the registrars to do so, and without standardization of such shared information, and if any information has been shared, it remains unclear how such information is going to be useful or trusted. Someone might not trust it because it's shared voluntarily by the registrars, and if it's not standardized, then it will be hard to utilize them as a database or something.

And secondly, if there are other requirements in the controllership arrangement between ICANN and contracted parties and such audits have been conducted by ICANN Compliance and the results of course should be published. Otherwise, ICANN Compliance can share information about the numbers and context of accuracy complaints they receive. And I think that's our input. Thank you very much.

MICHAEL PALAGE:

Thank you, Majnu. So, on this first response, are there any questions or concerns from any of the other team members?

Seeing none, I do note that there does appear ... I actually had some side discussions with some team members this week and I have noted that, having clarity on this nature of the controllership arrangement between ICANN and the contracting parties does appear to be a recurring theme. One could even say: does that become a conditioned precedent for the work that we need to do? Because without that clarity, it does potentially limit what can and cannot be done. And more importantly, where the responsibilities

for that comes in. Okay, Lori, I see, yes, you agreeing with that as well.

So, that is something that perhaps this may be something that we want to, again, tee up, not only within the group as we look to wrap up assignments one and two but something that we may want to make part of that public deliberation and see if there is any community feedback during ICANN73.

Let me go back here. Let me check my notes. Okay. With that, we're heading towards consent. Rough consensus is on the horizon. That's always a good thing.

I see no other hands up, so can we go to the next response, please?

All right. So, who do we have on the GAC? I'm just scanning real quick. We have Ryan, Melina. Who will be presenting and walking through the statement here?

MELINA STROUNGI: Either is fine by us. I don't know. All right. I can start presenting and Ryan at any point, he can come in.

MICHAEL PALAGE: We welcome that. Thank you, Melina. You have the floor.

MELINA STROUNGI: Okay, thank you, Michael. Basically, to begin with trying to respond to this question, we wanted to just start by emphasizing

how important it is that contracted parties are held accountable for the compliance with the actual RAA accuracy requirements and that it is important also increase transparency about compliance. Such transparency would really help to understand the extent of inaccuracy under the current requirements.

Beyond that and beyond how and if and when such more data can be found, it would be also important that contracted parties are in a position to demonstrate that they have procedures in place to ensure accuracy. For example, ensuring that the registrants confirm the accuracy of their data, the time of registration through verification.

Other ideas that we just brainstormed was to have a one-off study or to try and reimplement the ARS completed phases one and two which would allow continuous accountability. And also we would think that it would be very useful to have discussions on whether phase three of the ARS, which had been left incomplete, could restart.

So, we do take note that maybe GAC were not the best place to provide advice on how to obtain information for measurement, but we do believe that there are three issues that needs to be addressed. The one is the lack of data available for measuring accuracy, which I think has been repeatedly stated by everyone in this group. And then also the fact that there is lack of the ability to access such data and lack of the ability to measure accuracy in many other ways, that's also considered a problem on its own that needs to be addressed.

The GAC also supports the importance of agreeing to the definition of accuracy and then proceeding as to how to measure that agreed definition, especially if it is more expansive than what is currently required.

Also, to come back to the earlier point, we also support that there should be a clear distinction of roles and responsibilities between ICANN and the contracted parties about who is really responsible on measurement of the accuracy of registration data.

If this is already clear under the current contractual requirements, then such clarity or such distinction of roles should be also reflected at an enforcement stage.

So, for instance, ICANN should overcome any obstacles, precluding it from exercising its lawful purpose of monitoring contracted parties' compliance with the accuracy requirements.

Now, in the very unfortunately scenario that we don't want to think about, that the scoping team is unable to agree on the definition of accuracy and of what needs to be measured, then at the very least we would support to identify as a group what the legality, financially, and other constraints to measure accuracy and find ways out of it, recommend further points, development for accuracy policies and how we can overcome those constraints.

So this is our input. I don't know if Ryan wants to add something or if there are any questions; happy to.

MICHAEL PALAGE: Ryan, any additional comments?

RYAN CARROLL: I think Melina did a great job.

MICHAEL PALAGE: I do as well. Thank you, Melina, and thank you for you and your GAC colleagues to synthesize that. I think what was what I found very helpful in that statement is I know early on one of the issues was the use of the word definition or explanation. I think what you have done here in this contribution is help provide some of that gap analysis of where we originally started and where we are at at this particular inflection point in our work as we wrap up assignment one and two and how that may be an interesting point where we as a group may need to hit pause as we wait for further guidance on where we go with assignments three and four.

I see a hand up. Let me get to it. The hand is from Marc Anderson. Marc Anderson, you have the floor.

MARC ANDERSON: Thanks, Michael. Marc Anderson for the transcript. Can you hear me okay?

MICHAEL PALAGE: Hear you loud and clear, Marc.

MARC ANDERSON: Excellent. And thank you, Melina, for the overview. I thought that was excellent and I largely agree with you. I guess a comment. If you scroll up to the top of the GAC section, thank you.

So, just maybe want to nitpick one point here. The way this is worded, it says the importance of holding contracted parties accountable for their compliance with the RAA's accuracy requirements. I just want to nitpick here.

Contracted parties refers to registries and registrars but the RAA's accuracy requirements are applicable just to registrars. So that's a little bit of a nitpick there but I feel it's an important clarification to make.

Then, I just want to ask questions for my GAC colleagues. I hope this comes across as positive. I do generally like what's in the GAC feedback here, so I'm not disagreeing with any of it; I'm just trying to drill down a little bit on it a bit.

So, in the first paragraph, you mention increased transparency about compliance. I'm wondering if you could talk a little bit about what additional transparency would be helpful here. I'm not disagreeing with this point. I'm wondering if you have some specifics on what would be helpful or useful here.

And then, similarly, talk about the importance that contracted parties can demonstrate that they have procedures in place to ensure accuracy. Again, not disagreeing with this point at all. I think it's a great point. I'm just wondering if you could provide some examples or talk a little bit more about what that would look

like, how could contracted parties demonstrate that they have procedures in place to ensure accuracy.

I hope that came across okay and is taken as productive.

MELINA STROUNGI:

Many thanks, Marc. Maybe I can start and also, Ryan, if he wants to come in. So, first of all, many thanks for the remark. Indeed, this was just an oversight from our side, but indeed we deferred to both registries and registrars about the overall contractual requirements, so not limited to ... So, fair point. Well taken.

Sorry, forgot what your next point. Oh yeah, about increasing transparency. Basically, I think that was also a brainstorming exercise for us and whatever ideas we had, we just already input it in the document and in the same document, and I repeat as a kind of disclaimer that we think that we're not the best place to provide precise and concrete advice on how to obtain further information for measurement.

So, just a suggestion. I think the current situation has shown that it is important to increase transparency as currently what at least is my understanding is that there's certain contractual obligations in place and some of them include the accuracy measurement, and in principal, ICANN Compliance would play a role in that, but given certain obstacles such as the claim their inability to access data, this issue has been left kind of in there hanging and no one—apart from contracted parties—are able to measure whether contracted parties comply with these obligations.

So, I think this is why we try to address that this is a practice on its own, and if we need to find ways around it, one way would be finding ways to make it more transparent, whether it would be contracted parties providing that information, whether it would be ICANN to find legal ways to obtain this information, whether third parties will be involved or another way also for contracted parties to find other ways to prove their compliance.

So, basically, we haven't got a specific brilliant idea on how to do it, but it's important that we find a way to do it. We're happy to exchange ideas on this matter.

And Becky, regarding your question, does the GAC have a suggestion as to ICANN should overcome obstacles to access? I think this is a very important question and the one we're most personally struggling to understand. So, I understand that ICANN, under the current contract, has the responsibility of checking compliance of contracted parties of the accuracy requirements and it's not clear to me if ICANN has or plans to receive any legal advice as to why they think they cannot use legitimate interest as a basis to do so.

So really this is a question also for ICANN and I would be interested to see if they have received any legal advice on the matter and why they believe they cannot ... Yeah, basically that they cannot measure accuracy. So I think that's an important question. Thank you.

MICHAEL PALAGE: Thank you, Melina. And if I could just perhaps jump in and offer some thoughts and comments. Marc, on your first point about the limitation to just registries, I think that the notes in some of our background documentation started off with the acknowledgement that the current requirements only appear in the Registrar Accreditation Agreement. And as you may recall, this was one of the points of contention ... Oh, contention is not a good word. One of the points of divergence that I had acknowledged early on. I believe I cited a number of registry contracts in which there were representations by registries regarding accuracy or validation of certain data elements. So, hopefully, this is something that when we go back and look at that definition/explanation of accuracy that we properly incorporate that the primary contractual language right now appears to be imbedded in the 2013 RAA but also acknowledge some of the other language and business practices that some registry operators have undertaken. So I think that's the first point there. And I think Melina also acknowledged that broader importance.

The second item regarding transparency. I believe this was some of the points that were discussed in the previous weeks. I know Sarah has been very strong advocate here and I'm waiting to see if her hand goes up if I get this wrong, but Sarah has talked about the requirements where they, when they send out their annual email requirement or if they get a report, they do do that operational check, and if there is a bounce back, they then have additional procedures, which at least Tucows acknowledges that they follow.

So, I think that is what I read regarding transparency. That appears to be a voluntary practice that Tucows does. I know there were comments from others saying, “Well, is this widely ...”

I see a hand going up, so hopefully I got this right. I will stop there. Marc and Alan, I recognize your hand is up, but I want to go to Sarah to see if I did get that statement correct or not.

SARAH WYLD:

Hi. Thanks. So, just focusing specifically on the requirement of the WHOIS accuracy specification, which we can all review in the RAA, I think what you’re asking is tracking whether a bounce back occurs, a bounce back in response to an email from the WHOIS data [inaudible] policy, and then if the bounce back occurs, triggering the verification of the email. That is a requirement. That is not something that we have decided to do because we think it’s a good idea. We do it because it’s required under number four of the WHOIS accuracy specification. Thank you.

MICHAEL PALAGE:

Thank you. So, I’m close. I think, though, what I was hearing from Melina and Ryan—and Melina and Ryan, please jump in if I got this wrong—what they were talking about, though, is the transparency. While you and other registrars are required to do that, there is no insight into registrar, IANA number 123 had send out X number of verifications, got Y number of bounce backs, and took Z number of remediations. I believe that is what they were talking about as far as transparency, and if I got that wrong I

apologize but that is what ... When I read and heard the GAC intervention on this point, that is what I took away from it. Sarah?

SARAH WYLD: That's correct, Michael. There is no requirement to track or report on those rates. There is, however, the assumption that all active domain names have successfully gone through this verification process. So we can trust that if a domain name is active, then it has been verified and validated. Thank you.

MICHAEL PALAGE: Okay. Volker, I see your hand up, but I got in trouble last week for ignoring Alan, so I want to go back to the original queue which is Alan, Marc, and then Volker. Alan, you have the floor.

ALAN GREENBERG: Thank you. I'm glad I have a good guilt benefit to this working group. Two things. Number one, on the issue of bounce checking, I did have a private discussion with Sarah and a semi-public one last time and I will be formulating a question to ICANN Compliance regarding that, because although Sarah makes it quite clear that her registrar believes this is a requirement, there have been statements made by other registrars that imply that it may not be universal and I would like to get some clarity on that, so I will be formulating a question and proposing it. That's number one.

Number two. Melina asked the question of why has ICANN not approached the authorities on whether legitimate interest is a valid

reason for getting access to the data. My recollection is ICANN said when the ARS was ... ICANN Org said when the ARS was suspended, they had some minor discussions but they didn't really investigate alternative ways of doing it. So I think that question reformulated in another way probably needs to be asked also and I haven't thought much about exactly how. But essentially, it is have you or do you plan to ask the appropriately worded question. And if not why not? But that's something I think we need to formulate carefully. Thank you.

MICHAEL PALAGE: All right. Marc Anderson, you're next in the queue.

MARC ANDERSON: Thanks, Michael. This is somewhat overcome by events, but I raised my hand just to respond to a point you made, Michael, about some registries having additional accuracy obligations, and I wanted to clarify I was not arguing that point at all or disagreeing with your point about that. I think it's true and accurate, to use the loaded term.

My point was merely that registries are not subject to the Registrar Accreditation Agreement. We have our own separate agreement and are not subject to the RAA.

MICHAEL PALAGE: Thank you, Marc. Again, one of the loaded terms is that dark term, which I always try to be sensitive to using because I know how that is particularly problematic.

Next we have ... Alan, is that an old hand or do you want to respond to something that has been said or a new hand? That is down. Volker, you are next in the queue.

VOLKER GREIMANN: Yes. To add to something that Marc just said. It is true that registries can put anything in their agreements that's not illegal and basically make up their own requirements as they go along but that's not something that is subject to ICANN Compliance or ICANN regulations and it's not something that's up to ICANN policy making processes. This is simply a choice of a registry to implement certain factors that they feel are appropriate for their TLD, and if you don't want to implement [inaudible] registrar, well then you don't offer that TLD. That's as easy as it is.

And with regards to something that Sarah said, I think ultimately, it's always the obligation of the registrar to be in compliance and for ICANN to check whether a registrar is in compliance, it's always to prove a positive in compliance. It is never the obligation of the registrar to prove that they're in compliance unless there's indications to the opposite.

So, having all these statistics, it might be nice to have, but there's currently no obligation to do that. It sounds like a lot of make work for little benefit, except for this group maybe, but ultimately, there is currently no such obligation to collect this data. There's just obligation to be in compliance with the policy and I think that is sufficient.

And if a registrar indeed is not in compliance with those policies, then those facts will usually become apparent very quickly and ICANN Compliance can then remediate with their tools that they have at their disposal. Thank you.

MICHAEL PALAGE: Thank you, Volker. And just one important point and it's something that I know regarding this distinction between registry contractual obligations and registrar contractual obligations, I believe all three of the primary registrar representatives, they are part of a vertically integrated domain name company.

Obviously, there are requirements in the registry agreement. There are requirements in the registrar agreement. But the ability for, I would say, most players in a growlingly complex and, in some cases, integrated ecosystem requires knowledge of the requirements in both contractual agreements with ICANN. Brian, I see your hand up. You have the floor

BRIAN GUTTERMAN: Yeah. Thanks, Michael, and thanks everybody for the exchange. This is Brian Gutterman for the transcript. Just a procedural plea from my end. If we are or if certain SOs and ACs are putting together questions for Org whether that's compliance, for our legal team, if we could just get those in writing and if they're on a similar topic, maybe we could try and put together the questions in writing all together and then we can try and get those answered more specifically if what we've relayed to the group thus far in any of the

background documentation or in the previous round of Q&A we can do that as fast as we can.

I saw one question sort of being formulated in the chat by Melina and Alan referenced that he was perhaps putting together a question in writing, just again if we could please get those in writing in through the list or something like that, then we can work on those for the group. So, that's all.

MICHAEL PALAGE:

Thank you, Brian. And just to follow-up on the exchange or points raised by Roger and Sarah, at no point in time did I ever suggest you represented anyone other than the stakeholder groups upon which you participate. I was just making a note for the record that the companies in which you work for have multiple interests.

Case in point, Sophie who is a representative of the Registry Constituency, her primary employer I believe is a registrar, although that registrar does provide registry support services.

So, I'm just trying to acknowledge the fact that we live in an increasingly immigrated ecosystem, and I think it would be naïve to not recognize the dynamics of that. Are there any other questions?

I wanted to go back and raise a topic regarding the legitimate interest and this was something that was taking place right now for those people that are only listening to the audio recording. I would encourage you to go back and look at the chat.

Regarding legitimate interest. One of the things that I raised last week that was a point of intense discussion was in narrowly defining future studies, I raised the point of if we were to look at [OCTO's] reporting regarding domains involved in malware, bot attacks, spam, or other type of clearly illegal activity, that would probably represent the high ground of undertaking a legitimate interest survey or study.

The point that was raised by Owen and some of the other participants was that by framing that survey and that question, you potentially were going to skew the results based upon your initial pool.

That is something I think we're really going to have to look at, because if the legitimate interest is going to be the basis by which ICANN exercises its contractual rights to conduct an audit, we need to make sure that, in doing that audit, ICANN is I think in a position of maximum legal interest ... We need to maximize that basis of that legitimate interest. So I just put that out there for questions, comments, or considerations based upon last week's discussion and some of the legitimate interest discussion that has taken place today. Thoughts, comments?

Okay, I see none other than Sarah saying this is something that ICANN Legal should look into.

If you just give me 30 seconds here, so I can scroll through the questions in the chat to make sure I haven't missed anything.

Okay, just two questions here. I see a couple from Becky. And Becky, if you would like to speak to these, the two points that I

note here that you have raised in the chat are what basis other than legitimate interest would ICANN have? The second question that I think you raised to Melina and Ryan are: did the GAC take into account the ARS memo? Becky, are there any other—

BECKY BURR:

The last one wasn't my question, including the ARS memo. I was just responding to you, Michael. I just don't think that there is any other basis for ICANN to access data other than a legitimate interest, which of course turns on the contracted party that holds that data applying the balancing test.

MICHAEL PALAGE:

And I agree. And this was the point I tried to raise last week. If ICANN is going to have to undertake that balancing test, the best way to undertake that balancing test is to say we are asking these questions in connection with a clearly illegal activity. So that is why I thought looking at the data points that may come out of OCTO, that would be a great place to start.

The concern was if we only look at that data set, that may somehow skew the results. That's what I'm struggling with here. So I'm going to ask this question. If we had to choose between undertaking a survey of a legitimate data set but that data set perhaps resulting in skewed results, or ICANN never undertaking that survey because there were questions about that legitimate interest. Where do we err on the side of that? To undertake a study or not to undertake a study?

Sarah, you have the floor.

SARAH WYLD:

Hi, this is Sarah. So I think we have to figure out what questions we want to answer before we can decide what question to ask. So, if we look at the data—registration data—for a set of domains that are suspected to have done bad things, then we will learn about the accuracy of registration data for this set of domains that are suspected to have done bad things. But that doesn't tell us about the accuracy for all domains.

So, if we want to look at the accuracy for all domains, then we should decide we want to do that. It goes back to our earlier question of what is accuracy and do we yet have evidence that we have a problem? And if we don't have evidence that we have a problem, maybe gathering more information is useful, sure, but maybe that also suggests that we shouldn't put too much resources into it. I don't know. It's a thing to think about.

So, really, I think before we start actually looking at data, we have to figure out what question we're trying to answer. Okay, I hope that helps. Thanks.

MICHAEL PALAGE:

I think that does help, Sarah. And as I noted last week during our call, if we were to start focusing just on using the universe of domain names associated with OCTO reporting, that actually may even further help the issue of maliciously registered domain names versus compromised domain names. I think that's another thing.

If we are going to undertake a study, can that study actually provide valuable data points in more than the original question and perhaps answer other legitimate questions that we have.

Steve, I see you have your hand up and your camera on. You have the floor.

STEVE CROCKER:

Thank you, Michael. The point that I've been pushing in the chat and I want to elevate it here, too, is that I don't understand at all how checking accuracy impinges on privacy in any fundamental way in the sense that the process of checking for privacy, whether it's done by a contracted auditor under contract to the registrar or a contracted auditor under contract to ICANN or in several other ways has any material affect on the privacy concerns that are the focus of GDPR. This is not the same.

Checking accuracy does not necessarily involve publishing any information exposing that to a general public concern. So it seems to me that the exposure from a privacy point of view that's involved in checking accuracy is absolutely minimal. I just don't see an argument that holds any water with respect to the GDPR concerns if you have a properly constrained accuracy checking process. So that's one major point.

And the second, which I brought up some time ago in response to Volker is, as best I can tell, the argument is, well, you have no data; therefore you have no basis for knowing there's a problem is actually backwards.

The status quo prior to GDPR was we knew we had a problem. Plenty of documentation of that. And a requirement under the WHOIS report some time ago to try and improve accuracy and reduce inaccuracy by 50% I think was the language that was said.

So, absent any current data, we have to presume that things are at least as bad as they were, and therefore it is necessary to go and accumulate new accuracy statistics, not just triggered by specific reports of particular cases, but to establish a general baseline. Thank you.

MICHAEL PALAGE:

Thank you, Steve. And while I agree ... Well, let me rephrase that. While I am incredibly sympathetic to the logic of your argument, I believe that Sarah and others have noted that the GDPR talks about processing. So it is not just the disclosure but processing that needs to fall within the remit of the GDPR. So when a third party is processing that data to check its accuracy, even though there may be no public disclosure, that still does give rise to GDPR concerns and this again is one of the reasons why, for purposes of a legitimate interest, if we focus on activity on clearly identified illegal activity, that would put ICANN in the best position to undertake that analysis.

So, I just wanted to do that, make that acknowledgement that the GDPR processing is much more ... Is broader than just public disclosure.

STEVE CROCKER: I understand, but nonetheless, the degree of exposure that's involved is extremely constrained and the point that you're making is that that doesn't relieve you of—relieve any of us of—making the argument that this is in conformance with GDPR. But it would seem to me straightforward and well within the scope of what's [inaudible] in GDPR to make that case and to make that case very cleanly. I'm not being dismissive of GDPR completely; I'm just saying that the degree of exposure, whether you call it processing or anything else, in the case that you're checking for accuracy is very, very narrowly confined and what's done with that data after you've checked the accuracy is presumably to dispose of it or otherwise [inaudible] in some very clean way, so that there is no significant exposure from a privacy point of view and certainly no exposure that's inconsistent with GDPR.

And arguments that, "Well, you can't make that case and nobody's really solved it," really strain credulity in this whole process here.

MICHAEL PALAGE: Again, Steve, I am sympathetic to many of the points that you have raised, but I do believe that this does ... All roads lead back to what is the data processing agreement between ICANN and the contracting parties? Because without having that legal certainty, it is very hard for us to make certain recommendations on what can or cannot be done.

STEVE CROCKER: I understand. Let me add just one thing because Roger has put into the chat saying that I mentioned lots of data showing there's

an accuracy problem [inaudible] data based on current accuracy requirements. Can I provide the data?

The conundrum is this. The curtain came down and therefore there's no data available. Volker, among others, has argued, well, if you have no data, then you have no case to make. I think it's exactly the opposite, that without current data, then at the very least you have to depend upon the prior state of affairs which showed there was a big accuracy problem. So trying to use the lack of current data as a way of saying, "We have no problem and therefore we must not proceed," I think is exactly backwards and the answer is, "We have no data, therefore we must proceed."

MICHAEL PALAGE: Okay. Going back into the queue. Volker, you have the floor.

VOLKER GREIMANN: Yes. I think Steve has it backwards here. Privacy concerns do not necessarily take into account what is actually done with the data or what the purpose of transferring the data is. The mere fact that the data is processed by a third party and transferred to a third country can already be an impact to the privacy regardless of whether there is abuse with that.

Case in point, the [Austria] Data Protection Commissioner just recently decided that the use of Google Analytics is absolutely contrary to European Data Protection legislation simply because there is the possibility that the American state could access the data or could request the data from Google for whatever purpose.

I'm not saying that there is a concern. I'm just saying that privacy can be impacted by any transfer, any processing that has not been previously permitted by the [inaudible] to the registrant. That's one point.

If you look at the past data, then you will also have to admit that the data that we have from the ARS shows that the solution that was proposed to the problem that was recognized in the past, which was the element of the 2013 RAA that deal with accuracy have caused the data accuracy to greatly increase and we had contactability of registrants in the high 90% range, if you take together all the data that is available in the WHOIS.

So, there was a very high degree of accuracy already and the accuracy had been improving from year to year in the ARS iterations. So the last data that we have available is that data was significantly improving in accuracy and the main target of accuracy which is contactability was already achieved for I think 99 or 98% of the domain names, which I think is a very high ratio and more than we could ever ask for. Thank you.

MICHAEL PALAGE: Melina, you have the floor.

MELINA STROUNGI: Thank you, Michael. I think—I don't know if I'm overly optimistic. Even if the discussion seemingly may goes in a circle, I think we are making a big progress on focusing on the one problem at a time. I just wanted to reply to some previous comments because you, Michael, asked whether we as GAC have taken into account

the ICANN Org memo on the ARS. And the answer is yes. We have read it and indeed the [inaudible] expressed that ICANN cannot access the data and they don't know if they can rely on legitimate interest to do so.

Now, we're not in a position to provide legal advice and I don't want what I'm going to say to be interpreted in any such way, but as also Ryan posted in the chat, I find it hard to believe that just because something is marked as GDPR related, it becomes automatically off limits. Processing of data is not forbidden. It's just the GDPR is there to ensure that certain safeguards are going to apply.

And of course as Alan pointed out, in case we do decide that there is legal basis for ICANN to process such data, of course it would be in compliance with the GDPR. Of course there should be safeguards in place. Of course. No one is really debating that.

I mean, I'm privacy law background myself, so I could never suggest a solution that would not be GDPR compliant.

What I'm trying to understand is why the ICANN believes what they believe and if they have previously received legal advice on the topic. And this is why I think it will be useful to have this question because there is plenty of guidance already from the European Data Protection Board from our Article 29 Working Party where they explicitly refer to the notion of legitimate interest of controllers and of third parties. They do mention cases of legitimate interest could be prevention of fraud or misuse of a service. Legitimate interest examples are physical security, ID, network security. They do refer to transparency, to accountability.

So really, there's an extensive guidance out there that gives sufficient grounds to believe that ICANN could have a legitimate interest in doing this.

Just curious, an interest in knowing if they have ever received concrete advice on this topic and if they're planning to receive. And if they have received it, I would be interested in hearing what this analysis is. Thanks.

MICHAEL PALAGE: If I can, Melina, is that a specific question then to Brian and to Brian's previous comments about getting something in writing? Is that something you, Ryan, and the rest of your GAC colleagues would be able to put into a question to submit to ICANN?

MELINA STROUNGI: Yeah. We can do that.

MICHAEL PALAGE: Ryan, would that be helpful?

RYAN CARROLL: That would be helpful and it's not that we're not following along here and noting these questions and concerns or whatever it is, but we would appreciate specific questions in writing. That would be great. Thank you.

MICHAEL PALAGE: Perfect. And what I may do there is I think that those comments actually were pretty helpful to me, Melina, when you were raising them because one of the things that popped into my head was I just signed up for the ICANN73 meeting and ICANN processed my personal data. I was thinking back to when we all used to attend ICANN meetings in person and our data would not only be processed by ICANN Org but the vendors that would check us in and would have access to our PII.

So, the idea here that ICANN can process PII as part of a legitimate interest in fulfilling its mission, I think begins to raise the question if ICANN can process PII for purposes of facilitating consensus policy making, attending in-person meetings, what is the scope of their legitimate interest for purposes of an ARS study? That's kind of what just popped up into my head based upon the intervention that you were raising. That may be another question that we may want to ask to our ICANN Org colleagues via Brian in a written submission.

Scott, you have the floor.

SCOTT AUSTIN: Thank you, Michael. Two points. One, I applaud Melina for going back through some of the exceptions in GDPR and her specific knowledge of the articles and so forth. I would add to that only that the exception for legal persons, also known as juristic entities, because their data is publicly available anyway. That's their tradeoff for being able to have limited liability as a legal person or juristic entity.

But my real reason for raising my hand, Michael, as much as I appreciate the discussion on privacy interest, you are asking a fairly complex question before we got to that point and you mentioned OCTO. I wanted to be sure that if that was the same information as was provided in the recent EU DNS abuse study or if that's found somewhere else. Just wanted to follow-up on your question there.

MICHAEL PALAGE: That was directed at me and I was responding to Volker. I was attempting to multi-task, so what I'm going to do is could you please repeat your specific question to me. You have my undivided attention now.

SCOTT AUSTIN: Oh, I'm sorry, Michael. Yes. My question to you was you were speaking. You had a fairly complex question that had several parts including an assumption and you ended discussing or noting OCTO data, and if you could either repeat that question or summarize it or get back to it, I thought it was a very important question. But my question dealt with OCTA, specifically whether that was the same data as was provided in the recent EU DNS abuse study that came out in January. Thanks.

MICHAEL PALAGE: So I want to be careful here. Right now, ICANN is dialoguing with the contracted parties regarding increased access to public data which they have access to, to undertake the work of OCTO. So I

want to be careful not to speak out of turn regarding those negotiations that are going on right now.

What we know is that OCTO does produce lists of domain names and it is possible, as the owner of Palage.com, it is possible for a domain name in and of itself to contain—surprise, surprise—PII. In that instance, however, if those domains that OCTO identifies as being involved in spam, malware, command and control bots, all that other nefarious and illegal activity, that currently has not, to my knowledge at all, ever involved personal data other than the domain name itself.

The question that I was raising is since we have a clearly defined universe of domain names in which illegal activity appears to be happening with, that probably represents the best universe of data where ICANN could demonstrate a legitimate interest to dig deeper and say who is associated with that domain name; and as I articulated last week, in asking that question, who is associated with that domain name and is the domain name that was presented accurate or not, could go to the question of, yes, it was accurate and it was registered to a stupid criminal who gave his or her real name. It was maliciously registered with synthetic or patently false data. Or the third area, which is compromised domain names, someone actually legitimately registered that domain name but it was compromised through some other means.

So, that to me would be the purpose of how a survey ... What I'm thinking, what I've heard, could answer those multiple questions. So, hopefully that answered your question. Yes?

SCOTT AUSTIN: It gives me direction and some guidance to follow up, so I'll get back to you with further questions after I've had a chance to do that. Thank you.

MICHAEL PALAGE: Alan Greenberg, you have the floor.

ALAN GREENBERG: Thank you. Two brief points. Number one, I'm happy to work with Melina and Ryan to formulate that question and I'll let Melina and Ryan know if they're not still on the call.

And number two, I am getting increasingly annoyed at being lectured and reminded that any future data processing is going to have to be compliant with GDPR or appropriate privacy legislation. We know that. Can we please stop spending time reiterating that here? Thank you.

MICHAEL PALAGE: Thank you, Alan. Volker, you have the floor.

VOLKER GREIMANN: Well, obviously any future processing ... No, I'm not going to do that. I actually had a different point, which is to the comment by Melina. I think the EU has already put in place a much more relevant system of identifying who is behind an email and who is behind the website which is putting that data on the website or in the email. There is legislation in Europe that requires that

information to be on the website and in the email and that is much more relevant for the consumer than the data in the WHOIS.

With regard to what you said, Michael, that we would differentiate between malicious or compromised domains, I think that's nigh impossible, especially for [pure play registrars or pure play] contracted parties that do not control the hosting, because only by looking at the hosting will you find whether a domain name has been compromised, defaced or if it's actually designed for that. There are some cases where you can make the determination, but in many cases, it's just not that visible for us.

To another comment that was raised earlier with regards to the non-protection of legal person data, well that's not entirely correct and I think we addressed that in various previous working groups already because legal person data may or may not still contain personal information of employees or other individuals that are involved with that legal entity, and therefore that data still has to be protected because of the data that it contains.

so the question here is not to differentiate between natural persons and legal entities because legal entities have data or provide data that can just be as protectable as natural person data.

And finally, to your point, Michael, with comparing this to the collection of attendance data for ICANN meetings, there is a very big difference here. When you register for an ICANN meeting, ICANN will ask for your consent to collect the data and to process it. Also you have the option to tell ICANN not to publish the data publicly on their website or to do so, depending on what your

outlook is. Basically, there is a big difference between the registration data and the attendance data for the registrants for the ICANN meetings. Thank you. Lots of points. Sorry.

MICHAEL PALAGE:

Thank you, Volker. I do want to respond to that question about ICANN meetings being different. Becky, maybe either you or Harold could provide clarity. It was many of years ago that I did serve on the ICANN Board, but when I did, I was in charge of the meeting. One of the committees I served on was the Meetings Committee. And I can tell you that there are certain hosts where ICANN would attend the meeting where they would require access to validating a government-issued ID.

The reason I can say this is I recall one meeting where two ICANN colleagues, which I will not name, attempted to register as Bert and Ernie and they had to provide their real name or they were going to be asked to leave the venue.

So, all too often—and Volker, this gets back to your point—there could be a scenario where there's some data associated with an employee that somehow triggers the GDPR. All too often, the registrars are expressing valid concerns. I do not want to undermine that. I want to recognize that. You have legitimate concerns. You currently lack a data privacy agreement with ICANN, so I am incredibly sympathetic to that.

I think the question is if we're always going to be looking at these edge cases and saying, well, we need to protect against that, should we not be looking at ICANN in the mirror and saying, "How

are you processing other data?" How are you processing data of those people? And just to say, oh, I gave the consent, I gave consent to GoDaddy when I register and maintain my domain name. So how is that consent different?

That to me is I guess part of this conundrum that we're in. Sometimes, we look at a problem through one lens and say we need to protect against these edge cases. But then in other situations, where ICANN is processing data, we're like, "No, we're not going to do that." If we are going to apply a standard, I think that standard should apply for all processing activities of ICANN, not just the subset of that. That to me is where I believe there is a sense of frustration among the participants within this group and it goes back to I think one of the comments that Alan stated earlier in the chat, ignorance is bliss, right?

So, again, I'm not trying to argue a point here. I am just trying to synthesize some of the frustration and challenges that I am hearing from the multiple camps or perspective within this group.

Scott, you have the floor.

SCOTT AUSTIN:

Yes. Just a couple of points in terms of what Volker mentioned. I fully agree with what you just said, Michael. But his comment about the fact that the EU is providing through disclaimers on websites or through regulating emails from websites and the requirement to say who generated the email, etc.

Many of the cases involving phishing involve inactive websites, so there is no ability for either those regulations to apply or for the

disclaimers to be provided and it is merely the fact that the inactive website has certain codes that are made available for mail servers, etc., that the phishing can be conducted. So I still believe that there is a need for there to be protection against phishing by the use of domain name of registrant data or access to registrant data. Thank you.

MICHAEL PALAGE: All right. Becky, as I'm trying to read, would you like to verbally share [inaudible] your question? It would be helpful for me. Yeah. Go ahead, thanks.

BECKY BURR: I sort of have a lot of sympathy with Alan's comment about, of course, all processing must be done in compliance with GDPR and data protection law. I also have enormous ... I mean, I just think that all of us sitting around the table and saying GDPR permits this or GDPR doesn't permit this is a waste of time because, really, literally I could find guidance to support any position that I wanted to take.

Volker's comment about what the Austrian Data Protection Authority and the French Data Protection Authority did with respect to analytics data, it is in fact case in point.

I think I would just like to suggest that we have two questions in front of us. The first one is do we need more data to understand the accuracy issue? And if the answer is yes, what is that data that we need and what are the possible sources of that data?

Let's answer those two questions and then ask ICANN or whoever it is we think we need that data from if there is a way to get it. Because arguing with each other about whether GDPR permits something seems to me to be insurance that we will still be talking about this issue weeks and months from now.

MICHAEL PALAGE:

Excellent. Thank you, Becky. I'm just looking. We have no further hands up. I was also just informed by our ICANN Org colleagues that Susan had to drop because of a bad Internet connection, and although the BC had done their assignments, I do not necessarily ... Well, let's see if it is self-explanatory. And if it is not self-explanatory, we can perhaps follow-up with questions next week.

I'm just going to read this into the record right now. The BC statement here says that the ICANN community lacks the ability to track and measure the issue of accuracy, relying on third parties to proactively report accuracy issues now that GDPR has impacted the display of registrant data is a non-starter. But a few compliance submissions for inaccuracy is not an indicator of a lack of a problem. The BC has been able to point to many accuracy issues prior to GDPR and fully believe that those issues still exist. Nothing has improved. We need to move forward with implementing the EPDP which will allow the access to the data when requested.

This is now blocked by the lack of ICANN Org [inaudible] agreements necessary to implement the EPDP. We should continue to push the implementation of the RDSRT

recommendations and encourage ICANN Compliance to proactively review registrant data for accuracy.

I believe that is pretty self-explanatory. Are there any questions or concerns on that?

Seeing nothing. So, real quick, I just want to do a real quick ... Oh, Marc and Volker there we go. Marc Anderson, I saw your hand first. You have the floor first.

MARC ANDERSON: Thanks, Michael. I know our BC colleagues aren't on the call and that's a shame. But without commenting on whether I agree or disagree with what's in the BC statement, I'm not exactly sure how that tracks to our assignment, or more applicably, how to measure accuracy which is I think is what we've been assigned. I guess that would be my feedback on this one. I think it's a little off target for our assignment is all.

MICHAEL PALAGE: Okay. I will follow-up with Susan and the BC. I do see your concern here. this is more of a problem statement as opposed to what specific steps could be made. So perhaps the BC could tweak that. I will discuss that valid point. Volker, you have the floor.

VOLKER GREIMANN: Yes. I have a bit of a problem with that statement because there is a lot of conjecture and assumption in there and very little and

actual substance. When they say that nothing has improved and they believe those issues still exist, well believing you can do in church. And the improvement, well ARS actually showed the opposite when it still existed.

So I think those statements are incorrect, and if they insist on making those statements, they should substantiate them.

I think any action with regards to checking the accuracy needs a reason and there needs to be some kind of problem statement first before we delve into any actioning. Of course we can have a fact-finding mission, but to require permanent accuracy checking mechanism or something like that, I think we first need to find out that there is actually a problem still. Thank you.

MICHAEL PALAGE:

Thank you, Volker. Stephanie, I am glad that you were able to join us. I'm just reading your comment in the chat where it talks about if ICANN finds itself with criminal behavior. Can you elaborate on that specifically on what do you mean? I'm just a little confused on that question in the chat.

STEPHANIE PERRIN:

Yes. I've been here for a while actually, Mike. Volker pointed out that there are two types of compromised registration, the compromised ones and the malicious ones. If ICANN takes on a role of ... Basically, I would call it a verification role because they are checking accuracy. It's not an audit role unless they I don't see how they could set themselves up as an independent auditor when they are the policy manager and the other half of the

contracts, but they, certainly, has everybody has pointed out multiple times can take on a role. Just its high time they were clear about what role they are planning to take on, they can do the processing.

However, there is a responsibility inherent with determining that there's criminal behavior and I am just wondering, in all the legal work that ICANN has obviously been doing to determine which role it is selecting, what the answer to those questions is. What responsibility does ICANN have with respect to investigating or further processing or passing on or sharing the criminal behavior that it finds out when it checks for accuracy and discovers either malicious registrations or compromising behavior which is also criminal? Thanks. Just a question.

MICHAEL PALAGE:

So, Stephanie, is something ... Just mindful of Brian's comment. Is that something that you perhaps [inaudible] and the rest of your colleagues might be able to reduce into a written question that we could forward to ICANN? Do you think that would be helpful?

STEPHANIE PERRIN:

Do you think it would be helpful? I'm just pondering in the chat. I think it would be helpful. I think it's highly unlikely that ICANN is going to share its independent legal advice that it has obtained. But I think it would be helpful to understand why it is taking so long to get a clear position from ICANN as to what its role might be.

Like this business of tossing this question back and forth between us and the board strikes me as a profound waste of time.

MICHAEL PALAGE: So, I would tend to concur with that. I would tend to concur with that and I generally have erred on the side of being over inclusive regarding questions. So yes maybe that's something you could ... And I would actually make this request of everyone. If there are questions that have been raised over the last two weeks where you think it would be appropriate to go back to ICANN, either ICANN compliance or ICANN legal ... I know the last time we were focusing most of our attentions to ICANN Compliance but we may be at an interesting intersection where we ask a number of pointed questions to ICANN Legal via Brian. So there we go. Scott, you have the floor.

SCOTT AUSTIN: I think Volker's comment about phishing sites was directed in part at what I had suggested and I think it misses my point because it really doesn't address the fact that the absence of a website obviates the regulatory or the disclaimer aspects.

But beyond that, criminals will never leave their real data anywhere. I disagree with that as well, because frankly, seizure cases, for example, go after the money. That is the account holder has somehow been able to obtain a bank card and those cards are regulated with bank databases that are verified and validated. And as a result, they are able to be found out through that means.

The fact that account holders are different than the registrant data that they provide, may change things from that standpoint. So, the

point is, as I said, that regulation does not necessarily deal with phishing when there is no website and the website is inactive.

MICHAEL PALAGE: Thank you, Scott. Volker, you have a follow-up. You have the floor.

VOLKER GREIMANN: Yeah. I wonder how phishing is done if there is no website to phish from and no email to phish because what other protocols are being used for that?

SCOTT AUSTIN: I didn't say it didn't have an email. I didn't say it didn't have an email. You can have an email without a website.

VOLKER GREIMANN: At least [inaudible] place that you have—

MICHAEL PALAGE: Time out. Just for purposes of having this transcribed, I just want to make sure everyone has the floor.

VOLKER GREIMANN: Let me just finish first and then you can come back. At least it generally is the case that when I send a business email, and a phishing email would probably also constitute a business email, I have to provide the same kind of data that I would have to provide

on a website simply because of the fact that I am addressing a third party and I am engaging in business activity.

So if you see the footer of a business email from Germany, than you will see that the same information is provided and that's required by law.

So, basically, the problem with a phishing site obviously is the registrant or the phisher will not use their actual data but will try to pretend to be somebody else, and that is also the case when they come to a registrar or a reseller or a web host to register that domain name in the first place that they are then going to use. They are not going to give us the same data that they're using. That is actually their data. They are going to give us some perfectly fine data that we will be able to verify and that will go through all processes that we can invent and will pass those with flying colors, but still it will not be theirs. I just wonder what the point is there.

MICHAEL PALAGE:

And with that, we are at the bottom of the hour. I think this was a good discussion. Yes. I think today was a good discussion. We do have to wrap up a number of assignments heading into the ICANN73 meeting. So I would ask everyone to please look at the definition/explanation as we try to really finalize that assignment one.

With that, unless there are any objections, I will call this meeting to a close and I just ask if Thomas and I believe Steve, I believe SSAC has ... I don't believe they have done it. So, SSAC and the

ISPs could please just finish this gap analysis or this particular assignment in advance of next week would be very helpful.

STEVE CROCKER: So, very, very quickly. I've been stymied because I don't know what we can say about how to get data that you don't have that hasn't been [so] already. So my inclination would be simply to echo Melina's excellent discourse on this.

MICHAEL PALAGE: Excellent. I will accept SSAC plus one to GAC. That would be sufficient as well. So, with that, I am going to call the meeting to a close. Stay safe, everyone, and I look forward to speaking with everyone next week.

STEVE CROCKER: Thank you.

MICHAEL PALAGE: Bye.

TERRI AGNEW: Thank you, everyone. I will stop the recording and disconnect all remaining lines since the meeting has been adjourned. Stay well.

[END OF TRANSCRIPTION]