## **ICANN Transcription**

## **IDNs EPDP**

## Thursday, 31 August 2023 at 12:00 UTC

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**DEVAN REED:** 

Good afternoon, good morning, good afternoon and good evening. Welcome to the IDNs EPDP call taking place on Thursday, 31 August 2023 at 12:00 UTC. All members and participants will be promoted to panelists. Observers will remain as an attendee and will have view access to chat only.

Statements of interest must be up to date. If anyone has any updates to share, please raise your hand or speak up now. If you need assistance updating your statements of interest, please email the GNSO Secretariat.

All documentation and information can be found on the IDNs EPDP wiki space. Recordings will be posted shortly after the end of the call. Please remember to state your name before speaking for the transcript.

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As a reminder, those who take part in the multi-signature process are to comply with the expected standards of behavior. Thank you and over to you Donna Austin, please begin.

**DONNA AUSTIN:** 

Thank you very much, Devan, and welcome everybody to today's call. I hope everybody enjoyed the break. I know that I did. I just can't remember what I had by way of updates, Ariel. Can you remind me?

ARIEL LIANG:

The update is the face to face workshop.

**DONNA AUSTIN:** 

Okay. So we are going to Kuala Lumpur for our face to face meeting in December. Thanks, Ariel. So just a number of the key details on the slide that Ariel's prepared. So Wednesday the 6th of December through Friday the 8th of December, so it's going to be three days. We don't know what the agenda is going to be yet. It's a little bit early but it will be phase two related we should be finished with phase one review by then so the focus will be on phase two.

Just a reminder that there will be travel assistance provided but it's for members, participants and liaisons that have met the 55% meeting attendance requirement. And ICANN will pay for your airfare, hotel and a stipend.

So, those that we have identified for travel assistance, you should be receiving an email from the ICANN meetings team that will allow you to book your travel. And I guess if folks don't receive that email but they were thinking that they would, if you can contact the leadership team and we can sort that out for you. So, any questions on that topic? Okay, I don't see any hands up. Dennis Tan, go ahead please.

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Good morning, everyone. Dennis Tan. Just a quick question. I know the agenda has not been set, but do you have any idea as to when that would be? I mean, three full days, I think the agenda is going to be packed. So, at least on my end, I would like enough time to prepare with my stakeholder group so that we can cover all the aspects of it. I assume it's going to be fast paced and we want to make progress and not just conversations but actually make some preliminary decisions or recommendations.

**DONNA AUSTIN:** 

Yeah, thanks, Dennis. That's an excellent point. So, we'll have a conversation among the leadership team and I'll get back to you on that. I would hope that we'll be in a pretty good position to do that, maybe early October, because we'll have to do the thinking about what we're going to discuss during the ICANN meeting. And then this will be about six weeks after I guess. We'll see if we can commit to having a better sense of what we'll be discussing in December, if we can get that to the team maybe early October.

Okay. So I don't think we have any other... Ariel, go ahead.

ARIEL LIANG:

Yes. So, actually there's a resource slide here about Community Travel Support Guidelines that probably can provide more information about the hotel, flights, booking, kind of what you need to know about this if you haven't done this before with ICANN. So, I will put this slide in the wiki agenda page and if any of you have specific questions, please feel free to reach out to staff, and we're happy to provide some more information.

**DONNA AUSTIN:** 

Okay, thanks Ariel. So, for this week, I think we're going to start going through the Phase 1 review. So, the leadership team have worked their way through the document again, in light of the discussion we had around the public comments we've received. So, what we want to do here is start working our way through that. So, Ariel's got the doc there in chat, if you wanted to pop that out onto another screen.

I guess the most substantive one and where we've had the most discussion among the leadership team has been around Recommendation 3.5, Implementation Guidance 3.6, and I think Recommendation 3.9. So, we're going to go through this sequentially. So, we're just going to start at the top and make our way through. But that's probably where we had the most substantive discussion with the leadership team. So, I think with that, Ariel, we can start to make our way through.

ARIEL LIANG:

Okay, sounds good. So, we're just going to go sequentially through this document, and I hope many of you already had a chance to preview it. So, the first three pages are, we're going to skip them for now because this is the introduction section for the recommendations. We may update this later on as we settle on the language for the recommendations. So, we're going to start with Recommendation 1.1. And another thing I want to mention is since we didn't see a lot of substantive impact on the recommendations with the exception of a few, what we did is to directly make red lines on the chapter in our initial report that included all the preliminary recommendations. So, you can see exactly what changes have been made with the basis of the content in the initial report.

So, it's the same structure. And 1.1, the only change we made is the global wording change that was proposed by the leadership team and agreed upon by the group is basically when we refer to existing gTLDs, we just say "existing gTLDs" and we don't use other phrases like "delegated gTLDs from the 2012 round," etc. Because those can be limiting. So, basically, this recommendation just underwent this wording change.

And then another change we made is to delete the phrase led by the asterisk sign and move this into the rationale. But actually, for this recommendation, this doesn't really apply because RZLGR also applies to ASCII strings, too. They have to, ASCII strings have to be checked based on RZLGR to make sure it's a valid combination. So, this actually doesn't apply just to IDN gTLDs. So, this is crossed out.

And then for the rationale itself, we basically updated some sentences. For example, the first one, the new sentences is the EPDP team rely on data collected and analyzed by ICANN Org that calculate the variant labels of existing gTLDs, which have been delegated as a result of the 2012 rounds. So, it's basically to remove IDN here as well to make sure we also cross-checked all the ASCII strings as well. And then for the 2013 round phrase, we made it a little bit, I guess, better or clearer from a grammatic perspective. So, it's a very minor change here.

And finally, we included a paragraph about the public comment review under each section, under each charter question. So, this is basically to summarize what the wording change is. It's only used when referring to all existing gTLDs that are already delegated in the root zone and not to use the phrase 2012 round because it could be limiting and could potentially cause misunderstanding.

So, that's the extent of the update for 1.1 and I will stop here and see whether there's any questions or comments from the group.

DONNA AUSTIN:

Thanks, Ariel. Any concerns with the changes that we've made here? Michael's good. Is Satish okay? [Hadia is] good. Okay, looks like we have support, Ariel, so I think we can keep going.

ARIEL LIANG:

Okay, thanks, everybody. Next one, 2.1. This also didn't have substantive change. The only update is the wording change. So, we deleted IDN and from 2012 rounds. And when we're referring

to existing gTLD, we'll just say existing gTLDs. And also, there's another minor update is to delete the off existing IDN gTLDs after registered operator because it could be repetitive. So, that's the extended update to the recommendation itself.

And also, this recommendation does have a number of nuance that at the time it was developed, we envisaged that it would only impact the existing IDN gTLDs delegated as a result of the 2012 round. And that's due to the calculation of the RZLGR version 5 that they would only have allocatable value labels right now. So, we included this new sentence at the end of this rationale paragraph. And it's basically to explain the phrase led by the asterisk sign. Just to expand on this. And then for the public comment review section, we basically explained what the wording change is, is to remove IDNs from the language, because we want to make sure the recommendations are future proof. in case RZLGR update in the future also indicates that ASCII code points may have allocatable variant code points. So, we want to make sure our recommendation will still stand if that scenario happens. So, basically, this paragraph summarized that the rationale behind awarding change. So, yeah. So, basically, that's it for 2.1. And I will see. Okay. So, Nigel has his hand up.

**NIGEL HICKSON:** 

Yes, sorry. Yes. Yeah. Good afternoon to everyone. In the text, I mean, no problem with the substance, obviously. But just looking at the grammar, the last bit, allocated to the same registry operator or withheld for possible allocation only to that operator, only to that registry operator. I just wondered why the only is there. Because I'm not sure the only adds anything at all. Because

you're saying can be only allocated to the same registry operator or withheld for possible allocation to that operator. Or am I missing something? Thanks. It's not a great point. Yeah, I mean, it's not.

**DONNA AUSTIN:** 

Yeah, thanks, Nigel. I don't think you're missing anything. I think that we're just trying to be deliberate to ensure that there's no misunderstanding. But I see Justine's got her hand up. So, Justine.

JUSTINE CHEW:

This is Justine. Thanks, Nigel, for that comment. I guess from an English point of view, having only repeated twice, having that only word twice in the same sentence is a bit odd. But I guess, as Donna says, we just try to emphasize the point. So, I mean, I'm fine either way, whether we want to take out the second only or not. But I think there was a reason for it is the emphasis, really.

**DONNA AUSTIN:** 

Nigel, did you still have your hand up?

**NIGEL HICKSON:** 

Yeah, I'll take it down. Sorry. Yeah, no, I'm fine. I just made the point. But I think it's not. And if the emphasis is there deliberately, that's fine. Yeah, thank you. Yeah.

**DONNA AUSTIN:** 

Okay, thanks, Nigel. And I appreciate that some of these recommendations do get a little bit wordy, but I think it is because we're trying to ensure that there's no misunderstanding of what we mean. And that sometimes makes the language, I suppose, not as crisp as it might ordinarily be. Oh, so, any other problems with this or are we okay to go? Okay, I think we're good to go. Ariel.

ARIEL LIANG:

Okay, thanks, everybody. And thanks, Nigel, for the comment. Moving on to 3.1. The update here is also a global wording changes to remove IDN from this recommendation and just say application for allocable variant label cannot proceed application for that variant labels primary gTLD string. So to be more future proof. And since this is in a bundle, so I'm just going to go to 3.2 as well. So here the update is to replace delegated IDN with existing gTLD. And it's in line with the wording change that we just discussed above.

And in the rationale language, the same wording change applies is to remove IDN. And also since we're at the final report stage, we just remove mention of preliminary so we'll just say recommendations, but you know, generally, it refers to final recommendations. And also, the rationale for 3.2, it's reflective of the wording change we mentioned above. And then also whenever we say these recommendations are envisioned to impact only existing IDN gTLDs from the 2012 round, which is replaced from replaced from with that have been delegated as a result of to be more clear in what we mean.

So that's the update of the rationale and the recommendation. And for public comment review, we basically reiterated the wording change, what exactly they are, and these are explained a little bit more in detail for recommendation 1.1, 2.1. So here we just summarize that in bullet points. So that's all for 3.1 and 3.2.

**DONNA AUSTIN:** 

Thanks, Ariel. So, just to note that this is a little bit tedious, that we have to go through this in this way. But it's part of the process. So please bear with us. You know, just the way that we have to do this. So any concerns, objection, support here? Just put it in chat, that's fine. Okay, so Satish is okay. Zuan, Dennis. Looks good. So I think we're okay Ariel.

ARIEL LIANG:

Okay, sounds good. So the first four is pretty uneventful and I guarantee you it's going to be become more exciting. We'll get to the more difficult ones. So this is just a smooth kind of starting to get you in the mood but we're gonna get exciting.

So, 3.3, here the update is again wording change is to delete IDN and also from 2012 round and then just refer them as existing gTLDs. And we deleted the phrase led by the asterisk sign. So, I'm just gonna quickly go through because for this bundle we do have a lot of recommendations stacked together and just want to quickly mention the rationale for 3.3 before we go to the more difficult ones.

So here, the update to the rationale itself is to basically say the time this recommendation was developed it was only envisaged

that it would impact existing IDN gTLDs from the 2012 round and we incorporate this point in the rationale itself. And that was originated from the phrase led by the asterisk.

So, 3.3 is pretty easy in terms of the rationale language update. And I will stop here before we go to 3.4 just to make sure everybody's on the same page.

**DONNA AUSTIN:** 

Michael?

JUSTINE CHEW:

Yes, thanks. Could you please go back to the point you just read? You're still talking about the 2012 round here, right? Why do we need that? Maybe it's a language issue and I don't understand it correctly.

ARIEL LIANG:

Thanks Michael. This is Ariel. So let's just read this recommendation quickly. So it says application for allocatable variant labels of existing gTLDs can be submitted during the immediate next application round of the new gTLD program and any subsequent rounds.

So this could be confused with another recommendation. I think it's, I believe it's 3.2. Yeah, so it could get confused with 3.2 because it also talks about a registry operator applying for allocatable variant label. And that must be submitted in the application round. But this one talks about future registry operator.

And then this one talks about existing registry operator. So if you read these two recommendations together and you don't notice the detail, it could get a little confusing, like why we have two recommendations that talk about the same point. And also we deleted 2012 round from the recommendation language itself is because the group agreed including this phrase can be limiting. And if we say existing, we'll just say existing. We don't say 2012 rounds. But in the rationale, in order to make it clear to the reader why we have 3.3 is because when this recommendation was developed, it was only envisaged that IDN gTLDs that already existing and already delegated from the 2012 round, they would be impacted by this particular recommendation. So it's to differentiate this from 3.2. And the rationale provides a bit more detail about it. So that's why it's included in the rationale, but not included in the recommendation itself. So hopefully that clarifies and answers your question, Michael.

MICHAEL BAULAND:

Yeah, that should be fine. It's just the fact that there are TLDs before the 2012 round that also have variants, but since we strike out 2012 round in the recommended station, that should be fine. And we also covered the TLDs that were allocated before the 2012 round. Okay.

ARIEL LIANG:

Yes, yes, indeed, Michael. So the change to the recommendation language is to make sure it's future proof, because we know that before 2012 round, there were only legacy strings that are ASCII, if I'm not mistaken. So in the event that RZLGR update in the

future and provides allocatable variant label for ASCII strings, and then this recommendation will still cover those existing TLDs. But maybe I'm wrong. Michael, please go ahead.

MICHAEL BAULAND:

That's not the case. Before the 2012 round, there were TLDs like .tel and .cat that also had non-ASCII characters in their second level. And as such, they also had variants. Oh, we're talking about the top level, right?

ARIEL LIANG:

Yes.

MICHAEL BAULAND:

Okay, then, sorry, then it's fine. Then I take everything back, what I said. Sorry.

**DONNA AUSTIN:** 

Okay. Thanks, Michael. Justine?

JUSTINE CHEW:

Thanks, Donna. This is Justine. For Michael's benefit, I guess, in terms of the recommendation in 3.3, so we have future proofed it. So we're saying that for existing gTLDs, so it doesn't reference from the 2012 round anymore. So anything that's been delegated is covered by recommendation 3.3. But I think where you express your comment earlier is in the rationale. And the rationale, what the text has been added there is basically a representation of what

was the text marked by the asterisks that you see that's been struck out. So it just simply says that at this time when we're making the recommendation, we envisage that this recommendation only applies to existing IDN gTLDs from the 2012 round. But the recommendation in principle applies to any existing gTLDs.

**DONNA AUSTIN:** 

Okay, looks like Michael's good now. It was confusing top level with second level. So I think we're in a good space. Okay, let's keep going. And Satish is saying 3.3 is okay with him. So any other concerns with 3.3? Okay.

**ARIEL LIANG:** 

Okay, thanks, everybody for the comment and also chat. Moving on to 3.4, this one went through a bit more change compared to the previous ones. And I'm just going to read the new recommendation. It says a future applicant applying for a primary gTLD string together with its allocatable variant labels in the same round is required to submit one application for the primary gTLD string. And the variant labels.

So the reason this was revised in this way is because I think ICANN Org provided a comment about whether we should specify that one application per round covering primary and allocatable variant labels.

So I think the issue that ICANN Org had was the original wording is must be required. I think this phrase here. And so that leadership proposed this revision to make it clearer and also, I

guess, soften it a little bit too, is in the event that an applicant is applying for a primary plus allocatable variant label in the same round, if they're doing that, then the applicant is required to submit one application and not multiple applications for all these different labels in the variant label set. So that's why this recommendation is revised this way. And I can stop here and see whether there's any comment or question from the group. And also, I'm looking at Sarmad and Pitinan and Michael and see whether they think this revision would address the Org concern about the original wording.

**DONNA AUSTIN:** 

So I guess the question is here, given this was an ICANN Org comment that we're responding to, whether the concern still is there or whether it's all good. Hadia is okay with 3.4. So is Nigel. And AK, or maybe AK that was on 3.3. It's okay. Okay. So I think we have enough support to keep moving on this one, Ariel. We'll keep moving to the next one.

ARIEL LIANG:

Okay. Sounds good. Thanks, everybody. Next is one of the exciting ones I was alluding to earlier. This is a new recommendation. We haven't figured out the exact placement of this. So that's why it's numbered as 3.xx. So I'm just going to read this new recommendation.

After submission of an application, the applicant is allowed to withdraw and apply for a variant label from that application, but is not allowed to add any other variant label that was not originally

applied for in that application. Only an applicant for a .brand TLD string who's applied for primary gTLD string is placed in a contention set is allowed to change its applied for primary string and allocatable variant labels under the conditions set out in SubPro PDP recommendation 20.8.

So the origin of this new recommendation is an Org question for 3.4. It was asking whether EPDP team has any position with regard to allowing an applicant to add, withdraw or modify the variant labels through the application change request process, which was something recommended by SubPro. But SubPro's recommendation primarily focus on .brand TLD and only under specific conditions and circumstances. And that's what's recommendation 20.8.2.

So that's why this recommendation was created in response to that comment and leadership's view is applied for a variant label can be withdrawn after the application was submitted, but can cannot be added. The new variant label cannot be added to that submitted application. And then this change request process only applies to .brand TLDs as set out in SubPro PDP recommendation. So that's what leadership team proposed. And actually, maybe will help the group to take a look at the language in SubPro 20.8. So hopefully everybody will have a better understanding what this is about. It's fairly long, but it basically says, allows .brand TLD to change the applied for string as a result of a contingent set. And then the wording after this is spelling out the specific conditions and circumstances when this change is allowed. So yeah, that's the new recommendation. And

I will stop here and see whether there's any comments and questions.

**DONNA AUSTIN:** 

Thanks Ariel. So there's been a little bit of conversation with Justine and Dennis in chat. So, Dennis has summarized that there's no swapping of variant labels with the exception of a brand TLD variant label because of an already existing recommendation that allows for that. And that existing recommendation was in SubPro. So we're just providing consistency on that level. Sarmad, go ahead, please.

SARMAD HUSSAIN:

Thank you. This is Sarmad. There are two readings of this recommendation. And I just wanted to maybe point that out and see whether we want to adjust it to make sure that we only are getting one reading. One reading is when you say that applied for gTLD, applied for primary gTLD can be changed. One reading is that you actually change it to make it a variant and make an allocatable variant of the same set to be the primary. The second reading, of course, is that you say that, okay, this, what we are going to do is replace it with another string itself, which is not part of the same variant set. So it's a new string and a new variant set. I'm assuming it's a second reading, but just wanted to clarify. Thank you.

**DONNA AUSTIN:** 

Thans, Sarmad. I think it is the second, as you say, your second interpretation because that would be consistent with the SubPro

recommendation. So I think the SubPro recommendation was only allowed where there was, yeah, so contention set. So that's right. So you can swap out the .brand TLD string for something else. So I think it's the second part. So we'll take that on notice and see if we can clear up any misunderstanding about the intent of what that's supposed to be. Unless anyone has some suggestions on the fly here. Ariel.

ARIEL LIANG:

Thanks, Donna. Thanks, Sarmad, for asking the question. No suggestion to change this. And I just want to note that if the change request is allowed if a .brand TLD string is placed in the contention set, by changing its applied for variant label wouldn't change that situation. Because the hybrid model already taking into consideration all the variant labels of the applied for primary string. And then also the contention set includes the entire variant label set. So you have to change the primary string in order to get applied for a string out of a contention set. That's my reading of this. So in this scenario, you have to change the primary string. And then the applicant can choose to applied for allocatable variant label of that new primary string if it wishes to do so, but it probably not a necessary thing. So, so, yeah, that's how I interpret this new recommendation.

**DONNA AUSTIN:** 

Okay, thanks Ariel. I think we'll keep moving. Satish has asked in chat whether there'll be an opportunity for the community to provide comments on any changes that we make to recommendations here. and as I said in chat to Satish, it's not the

intent that the report will go out to public comment again. The main reason for that is because we didn't have a lot of substantive changes to the preliminary recommendations, based on the public comment process, so we don't think that it's needed to go out to public comment again. So this is our last chance here, it's in the hands of the team. I guess in terms of what the final recommendation ends up being and what we put to the council for consideration. Okay, Ariel.

ARIEL LIANG:

Thanks Donna. And also, I just want to add that the community input can still be provided through the membership of this working group, and if you check with your group about this proposed language, then it will be another way of soliciting broader community input through you. So definitely, in our discussion of these final recommendations, we will welcome that input. Yeah.

And actually this kind of [inaudible] very well to 3.5 because this wording actually has support by the ALAC team and they played a pretty important role in proposing this language. Thanks to the ALAC team. I'm just going to quickly read through this new language. And if you recall, the original recommendation is basically asking the applicant to explain why it seeks the allocatable variant labels of the primary applied-for string. And that's the original recommendation. And after a lot of discussion about the ceiling value and also free allocatable variant label that can be applied for, the group decided not to change those threshold number or ceiling value recommendations, but to strengthen some other recommendations that actually have an impact on the evaluation of the variant application itself. So, 3.5 is

one of them that is impactful for evaluating the variant label application.

And this is the wording that's supported and proposed by the ALAC team. Basically, we just kind of completely rewrite this. And the new one is, in addition to explaining the mission and purpose of its applied for primary gTLD string, a future applicant will be required to explain why it has applied for one or more allocatable variant labels of that applied for primary gTLD string. The same requirement applies to existing registry operators who wish to apply for allocatable variant labels of their existing gTLDs.

And the recommendation also includes what needs to be taken into account for the explanation. So, it must address the following factors. 3.5.1, the meaning of the applied for variant labels and how it is the same as the applied for primary gTLD. Actually, we need to put string here, string or existing gTLD. And then the second factor is the language communities who will benefit from the introduction of the applied for variant labels. Third, the benefits that introduced in the primary gTLD and the variant labels in the case of a future applicant or the variant labels to existing gTLD in the case of existing registry operator will provide to registrants, internet users, and the online community at large.

And the fourth factor is how the applicant plans to mitigate the potential risk of confusability to end-users. And I note that Dennis already put a comment here, unsure as to how this would be measured and or evaluated should this term be registrant instead. So, yeah, that's the proposed language here. And I know it's a lot to digest. And I will stop here and see whether there's any comments from the group.

**DONNA AUSTIN:** 

Thanks, Ariel. So just to add to the comment that I made before about no further public comment. There will be an opportunity for folks to think about the revised language that we've come up with here. So we know this is the first time we're having a conversation around it. And what we're trying to do here is just explain from a leadership perspective how we got to where we are, see if there's initial thoughts on it, and then provide an opportunity for the teams to review the text in their own time. And then where we think things are still problematic, we'll come back as a group and discuss them again. So, Sarmad, go ahead, please.

SARMAD HUSSAIN:

Thank you. This is Sarmad. Just, I think, looking at it from an implementation point of view. So when the applicant provides this information, I guess the question is that, will this be evaluated? And if it is evaluated, what is the group currently thinking? How should this be, who should be evaluating it? And, for example if, okay, so I see that I'm probably, I should wait and see IG 3.6 before we get to it. So let me stop here. Thank you.

**DONNA AUSTIN:** 

So Ariel, maybe if we can just lift the text for IG 3.6 up so that they're, I don't know if there's any way we can get them both on the same page, but so that the intent is, well, I won't tell you what the intent is. From a leadership perspective, it's something we spent a bit of time on, and this isn't going too far away from what the thinking was on the original implementation guidance 3.6. That

there's a panel of evaluators with relevant language expertise that would do the review.

But I think what's probably the second important piece of this is whether there should be a score attached to this evaluation. So that's the conversation I'm hoping to have on this one as well. So, Ariel, is there anything else you wanted to add on 3.6?

**ARIEL LIANG:** 

Maybe just for the benefit of the group, I can read it because this is a complete new implementation guidance right now. And then I will also welcome Steve if he's in condition to chime in because he did propose this last bit that's highlighted here.

So, a panel of evaluators with relevant language expertise should review the explanation submitted by an applicant for its applied provider labels using criteria based on a general standard of reasonableness. In other words, the submitted explanation should be reasonably legitimate and should address or remedy concerns arising from the factors set out in final recommendation 3.5. Additional criteria may be applicable, provided that they are pre-identified during implementation.

Evaluators may also ask clarifying questions of the applicant on the submitted explanation where evaluators think it is necessary but are not obligated to take the clarification into account.

And then this part that's highlighted here is basically an attempt to address Sarmad's question in terms of how it is, in what format this is going to be taken into account in the application evaluation.

So, it says consistent with recommendation 27.2 from the SubPro PDP final report, this set of criteria shall be scored on a pass-fail scale, zero or one point only. Applicants will have been presumed to have carefully considered whether applied provider labels are necessary, and as such, applicants achieving a failing score, zero points, should be on exceptional basis.

So, this is a language we probably need to kind of massage and work with the group. But in principle, what the leadership team envisioned is that 3.5, what this is asking is going to be a pass-fail kind of question in the application. But mostly, this is to prevent frivolous applications for allocatable variant label. Just because RZLGR says you have allocatable variant label doesn't mean you can just easily get it. You have to explain, the applicant have to explain all these details why it seeks to apply for variant labels. And then with the presumption that the applicant goes through all the trouble answering these questions, they definitely know what they're applying for. So, the presumption is they should be able to pass. But there may be some applicants, they still don't know what they're applying for, and they didn't provide a reasonably legitimate answer to these questions, then it probably will incur a failing score. So, I think this is what this additional element was talking about regarding the exceptional basis and the presumptions. And I saw Hadia has her hand up.

HADIA ELMINIAWI:

Thank you. So, basically, I do agree with implementation guidance 3.6 as written now. I don't see a reason, actually, for having a scoring system. Pass or fail is enough. The only thing that I raised my hand for is that, of course, the applicant will know the reason

for which the application failed. So, I don't know if this is determined in the implementation phase, or we do have something that says that evaluators need to inform the applicant for the reason for which the application failed. But again, I agree with implementation guidance 3.6.

**DONNA AUSTIN:** 

Thanks, Hadia. So, there is one question that's kind of outstanding here on the pass fail. So, the reason that there's a zero or you get a zero for a pass, one for a fail, maybe it's the other way around. We don't know what the situation is going to be, whether this isn't, in my mind, this may not be a fail of the application if they don't if the evaluators say that this part of the application is a fail, it doesn't necessarily mean that the application fails. I think what it means is that whether there's a, and actually it might be something that's been discussed by the IRT of SubPro, but whether there's a cumulative total, and there will be a an overall pass mark within that. Because in my mind, there are going to be other components of the application that are in good order, so that it doesn't necessarily mean that failing this question is going to be failing the application.

So, what would be good to understand is whether folks think that if the applicant doesn't answer these questions to the satisfaction of the evaluators, whether that's a fail of the application or whether it's just a fail of this question in the application. Dennis, go ahead.

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Thank you, Donna. I just want to provide some context to my comment on 3.5.4. So, I understand these are the questions that we want to put in the application, and the applicant would need to answer, and those answers would be provided to the reviewers and this panel of evaluators with certain expertise. I'm just trying to get my head around what type of information would the registry provide in 3.5.4 that would satisfy the evaluators, and knowing that when we talk about end users on one end, we have the applicant who likely is the registry operator, basically, right? And you have end users on the other end. So, end users, as in, I'm presuming here, trying to weigh this at face value, people using the internet, right? So, that's a bit of a gap between the registry operator and end users, and asking the registry operator to explain, describe how they're going to mitigate potential confusability that end users would have. And that's why I would say maybe we want to refer to the registrant, because that's something closer, maybe in control, or some reach that a registry operator might have over registrants, even though we know, right? Registry operator distributes domain names through registrar channels, and registrars, wholesale, retail, resellers distribute domain names to the registrants, and even the registrants can take those domain names to a hosting provider, a website hosting provider, or an email hosting provider, and then build up the services that they want to do. So, there are a lot of intermediary steps, and I don't see how the registry operator will have any enforcement or even a communication channel to the end users or registrants for that matter. So, trying to get our head around, what do we mean with that? Or how do we want to get it? Because I think this question, right, this question goes to the heart of why do

applicants want to apply for a variant label? Why do you deserve the variant labels? And if they fail this question, I would assume it has more weight over the others, right? So, trying to get a sense of what we're trying to get from 3.5.4, and maybe then we can put something here that it's more closer to the registry operator's control and not you know, something which is down the stream and there's little control over something like end user experience. Thank you.

**DONNA AUSTIN:** 

Thanks, Dennis. I think that's a fair point. We don't want to put something in here that is not answerable. So, maybe we need to think about how we can reframe 3.5.4. Hadia?

HADIA ELMINIAWI:

Thank you. I'd like to attempt to answer Dennis. So, maybe the recommendation does not need to be specifically plans to mitigate. But I would think that any registry or applicant applying to operate a top-level domain registry would actually do some technical checks in order to see if the applied for TLD, whether it's a primary or a variant, does actually include some potential risks of confusability. And I'm sure that there are some technical checks that could be done in that regard.

So, identifying the possibility of confusability, I would think is a check that the registry needs to go through anyway. And then how to mitigate that risk. If, for example, the potential risk is like 70%, 80%, 30%, then how to mitigate that potential risk would depend on the probability of such risks happening. And then I agree with

Dennis that the registry does not have direct connection with the user here. But it could put out some recommendations with the potential risks and potential awareness like needed, accompanied by maybe some potential awareness required with that TLD. I don't know if that is practical though. But however, identifying the potential risk, I think, lies with the registry.

**DONNA AUSTIN:** 

Thanks, Hadia. Zuan, Justine, and then Salma.

**ZUAN ZHANG:** 

Thanks, Donna. This is Zuan speaking for the record. Just a quick comment. My attention goes to the second part of 3.5.1. When I read the second part, how it is the same as the applied for primary gTLD string or existing gTLD, I might think that the meaning of the primary gTLD and its variant is a variant. They are same in nature. So I wonder it might be a little bit redundant to mention the second part. So I might be wrong. If we delete the second part, I think 3.5.1 and 3.5.2 might be integrated. Thank you.

JUSTINE CHEW:

I can address that if you want, Donna.

**DONNA AUSTIN:** 

Sure, Justine.

JUSTINE CHEW:

So I think the reason why 3.5.1 has both applied for primary gTLD string or existing gTLD is because this particular recommendation covers both types of applicants. Whether it's an applicant who is already an existing registry operator with an existing gTLD that's applying for variants of that existing gTLD or a new applicant that's applying in the group a primary gTLD string together with the allocatable variants at the same time.

So that is why also if you see the body of the recommendation, it talks about in the case of this or in the case of that. So I think the logic is supposed to apply. Maybe it's not clear enough. And that's something that we can address. But as I said, that's the logic of why it has both applied for and existing in 3.5.1.

**DONNA AUSTIN:** 

Justine, can I just check with you? I thought your concern was more around the meaning and also having the same. Or was your point more of what Justine's spoken to?

**ZUAN ZHANG:** 

Yeah. Yes, Donna, I think you are right. Thanks for the clarification by Justine. My comment just focus on the meaning. Because I think the meaning of the applied for gTLD is the same with the meaning of the variants. So I think this is not a question. So that's why I think we might not need the second part. So thank you.

**DONNA AUSTIN:** 

Okay, thanks Zuan. I think I understand where you're coming from. Justine?

JUSTINE CHEW:

Okay, so I don't understand, but I'm going to leave that to Donna to explain it to me in the leadership call. I'm going to address 3.5.4, which is that I think potential risk of confusability is to end users. So to me, it's not to the registrants, it's the end users. But I think we can also introduce the registrants into 3.5.4 somehow. And I'm thinking something along the lines of, and I can't remember what the name is, but you have things like use terms. When you have a registrant reseller or registrant agreement, you have things like use case or use UAC or something. I can't remember the term, but suffice to say that how you would connect the end user. Yes, that's it. Thank you, Dennis. Yup. AUP, correct.

So that would apply to the registrant. So what I'm trying to say is the confusability is to the end users, but to mitigate it, we could introduce some way or mechanism through the registrant, which is this acceptable use policy. Thanks.

**DONNA AUSTIN:** 

Thanks, Justine. So I'll go to Sarmad and then I want to come back to a conversation that Maxim and Dennis are having about the fact that these questions are very subjective. So we'll come back to that in a sec. So, Sarmad.

SARMAD HUSSAIN:

Thank you, Donna. This is Sarmad. So on the last item, 3.5.4, since the variants are by definition same from the perspective of the user community, I think they are anticipated to be, I guess,

confusable strings, right, because they represent the same string in a particular script.

So, when we were developing variant TLD recommendations, and I guess we all appreciate that confusability eventually can lead to security issues, what was suggested in variant TLD recommendations was that the way to manage that was to make sure that the variants are controlled or managed by the same registry operator at the top level, and then the same registrants at the second level. And those things are, I guess, already now, something which the policy working group has, I guess, taken up.

So I guess the question is, with those already acceptable recommendations and already part of the work, what is extra mitigation, which is being, I guess, expected in 3.5.4? Thank you.

**DONNA AUSTIN:** 

Thanks, Sarmad. Okay. So, it seems to me that 3.5.4 is challenging for a number of reasons and I hear Sarmad was saying that now that we have recommendations for the same entity principle at both the top and second level, then that is the path to mitigate the risk of confusability. So there's a question of whether we need 3.5.4 at all, and particularly in light of the fact that the registry operator doesn't have much control over who's going to register a name at the second level, or actually what that name is going to be, and nor does the registrar really.

So yes, there are things like acceptable use policies, but still, unless you identify the list of strings that can be registered at the second level, it's a little bit hard to have any other kind of control

over your registrant. So I'm kind of wondering whether we still need 3.5.4, particularly in light of what Sarmad said about same entity principle. So that's one thing that I'd like to discuss, or at least put the guestion out there as to whether we need 3.5.4.

And just also to bring us back to the idea that the reason we've developed these sets of questions to go into the application is really an attempt to weed out frivolous applications. And that's because of some perception that there's a free ride for up to four variants if you're applying for a primary gTLD and you want variants. So we're trying to find a way to rein that in a little bit. And based on conversations we've had previously, we think that the maximum variants that will be applied for will be perhaps two or three because the root zone LGR has those limitations already, but we just don't know about Arabic. So really that's the one that we're trying to put parameters around. So that's the reason that we have these questions here.

I do accept Maxim and Dennis's concerns that this could be considered subjective. And it will be hard potentially challenges for the evaluators. But I don't know that that outweighs the fact that we need to do this. I think in responding to these questions, at least what we're hoping is the applicant is going to provide the evaluators a good understanding, be able to demonstrate that they understand what's involved in bringing the gTLD and the variants to light and that they actually need those variants to be able to do what they want to do with the TLD. So I think I don't see that as too problematic.

So I guess the other thing that is a little bit challenging is that I think there's a couple of assumptions in here that some people

might have and others don't have about what's the consequence of a fail. So is it one variant that's not going to make the grade or is it two or three variants that aren't going to make the grade and proceed forward. So we need to make sure that any assumptions that we have in that regard, that we spell that out reasonably well. So I think we've still got a bit of work to do on 3.5 and 3.6. So this language is still going to be out there for the teams to consider. And if we can get some feedback and perhaps we'll come back to this, we'll identify a date where we'll come back to this for more indepth discussion. So, Dennis, I think I saw your hand up, but it went back down. But is there anything you wanted to add?

spr4

Thank you. Yeah, just a final thought. I appreciate the willingness to work this out. I understand this question is important because it, again, goes to the heart of the applicant explaining how they justify the need for variant labels, right? And I think it's important.

At the same time, because we are drilling down and prescribing specific questions or items that the applicant will need to respond or provide an answer during the application process, I wonder, should we also implement those questions or items that are going to be a criteria as to how they should be measured by the evaluators and not leave that to a later implementation? I'm just, again, right, going back, the, I mean, 3.5.1 is pretty straightforward, the meaning. I think that's something that can be easily explained.

But then as you go down the list, how is the evaluator going to pass, fail those questions? Is it just because they're not blank, that

means a pass? Or is there going to be some level of assurance or I don't know how you're going to do it, but just as a way of example. They say they want to address 50% probability of accessibility and that awards half point of whatever scale that is. And that's what I'm trying to get my hair around. I understand where we are coming from. But just, I'm having difficulties as to how these will translate to a scoring system, because at the end of the day, that's what the application is going to be measured against, right? And scoring system, pass, fail. So, and these questions here is the heart of the Banyan application. So, how are we going to measure that? That's my concern and things.

**DONNA AUSTIN:** 

So, there is a little bit to unpack and what Ariel has highlighted here is that what our thinking was, was that there's a general standard of reasonableness. So, it's not—but I guess maybe to your point, how do you get consistency among the evaluators? If it is a panel or it's individual evaluators that happen to get these applications, how do they apply that standard? But the standard that we're proposing is reasonableness, which I guess, in my mind, it's not a high bar. But maybe Justine can speak to that. So we're not applying a high bar, but I think what I might be hearing from you, Dennis, is how do you apply, how do the evaluators apply consistency to the way that they're doing the evaluation? And do we need to specify something in that, in that regard? Satish?

SATISH BABU:

Thanks, Donna, Satish, for the record. So, since 3.5 and 3.6 have basically come out of the ALAC team, and we're getting some very good, very interesting feedback on what could be improved, we'll be happy to kind of work on this further and come back with a revised set of, I mean, revised language, taking into consideration this feedback so that the team can discuss it and refine it further. Thanks.

**DONNA AUSTIN:** 

Okay, thanks Satish. Just a couple of things on the text that's in red here. What's really important is right at the bottom where it says should be on an exceptional basis. I think we changed that in the leadership team to rare. What we're trying to say here is that the likelihood of this, of an applicant failing this application question should be rare. Which gives evaluators the freedom not to go really hard on this but to be reasonable in the way that they evaluate.

So when we introduced that red language whether it's a pass or fail, the intent was that in most circumstances in maybe 98% of the applications, they're going to get a pass mark. It would be extremely rare if they got a fail. So, Satish, thank you for offering to work with ALAC and see if you can revisit the language and address some of the concerns that we've discussed here today. And I would also encourage others—Dan will put out the notes from this call, so I would expect that they're going to be pretty fulsome. So I'd encourage folks if there's anything in addition that you want to pick up that you please do that on the list to help the ALAC team. Steve, did you want to speak to what you've just put into chat?

STEVE CHAN:

Hi, Donna, sure. This is Steve. Yeah, it says pretty much what I want to note, which is given the conversation about whether or not this criteria is subjective it's a valid observation, but equally valid is the fact that much of the new gTLD process is based on subjective criteria that trained evaluators need to be able to make outcomes across the program. And so the other thing I add is like, this is not a new problem. And it's even more acute in certain circumstances where, let's say in the 2012 round, there were actually two firms performing the financial and technical evaluations. And nevertheless, there was still a need to be able to come out with consistent outcomes, no matter who is actually performing the evaluation. So I just wanted to provide some content for the new gTLD program. Overall, subjectivity is an element. So this is not necessarily a new concept. Thanks.

**DONNA AUSTIN:** 

Thanks, Steve. Okay, so thanks for that reminder, this problem has been solved before in terms of consistency of evaluation. So no doubt that will be the case for variant gTLD applications. Okay. Where are we, Ariel?

ARIEL LIANG:

We can move on to the next few recommendations. Some are less exciting, some are more, actually equally maybe. So we'll keep the ball rolling. And thanks again for the very helpful discussion.

So 3.7, I won't belabor the description of the global wording change. So what it has done in terms of revision is the global wording change. And if there is no objection from the group, then we could move on to the next. And I'm not seeing hands or comments.

Okay. And 3.8, also, it's the part of the global wording change applies here. So the presumption is there's no objection from the group either. And then I do want to note that when the group was talking about the ceiling value and also how many allocable variant labels can be applied for free, there was agreement to enhance several recommendations and implementation guidance. And 3.8 was part of that group of recommendation implementation guidance that may be enhanced. But after some discussion with leadership, and there's no substantive change to 3.8, but you will see there's more change to 3.9. So I just want to note that for transparency. So I think I can move on to 3.9 if no objection to 3.8.

So for 3.9, I will read the new language. It does have quite a bit of revision. It says within 15 months of the delegation of the first gTLD variant label, and every 24 months thereafter, ICANN Org should conduct research in order to identify whether any additional criteria or tests should be used to evaluate the technical and operational capability of an applicant to manage a variant label set at the registry level. ICANN Org must provide the community with an opportunity to provide inputs on the scope of the research to be undertaken, as well as any proposed outputs on additional criteria or tests. And such outputs should not be applied retrospectively.

So the reason of these updates is from public comment. And I believe there are several commenters that asked about whether

there is a time frame for when that research needs to be conducted. And then also, I think the Human Rights Working Party did raise the point about the ICANN community needs to have an opportunity to provide input because it's influential.

And another point is something leadership believe it's important to clarify is the output of this research in terms of evaluating the technical and operational capability based on certain criteria or tests that cannot be applied for to the existing registry operators, basically. It will apply in the future to future applicants, but it won't affect the ones that already obtained delegated strings and already existing. So that's something that was added to this language. So I will stop here and see whether there's any comments or questions from the group regarding 3.9.

**DONNA AUSTIN:** 

Sarmad?

SARMAD HUSSAIN:

Yes, this is Sarmad. Thank you. So I'm just thinking out loud here, when and if we find any tests which need to happen, they will be applied to the next round of applications. But will they also, for example, impact RST, which is the Registry Service Testing, which is done, for example, if an RO is moving from one RSP to another RSP registry service provider. I'm assuming those will remain consistent, so it will actually also have an impact on RSP evaluation during the RST process. And so there is a potential of impact on existing ROs as well. Thank you. So

**DONNA AUSTIN:** 

Sarmad, I think the intent here, and I understand why you're asking that question, but I think the answer is no. And that's why we've said such outputs should not be retrospectively applied. I guess where there would be a difference is if you're swapping out your registry operator and the registry operator isn't currently operating an IDN, then maybe that would be a reason why you would apply the test retrospectively. But the intent is no. So this would whatever tests or new information comes out of this, it would only impact new applicants past that date. Sarmad?

SARMAD HUSSAIN:

Yeah, so I actually see some potential impact on the RSP at the RSP level, which may, for example, impact RSP evaluation or pre-evaluation for supporting IDN variants, right? I'm just trying to see how that will play out in context. Let's say we find out that there should be three more tests which should be done to support IDN variants for an RSP. So somebody who's applying for a new RO, a new RO who's applying through a new round, for example, for them, those tests will apply at the RSP level. But if an existing gTLD is not complying with it because that RSP doesn't have that level of, I guess, requirement implemented, they could still continue to offer. I guess I'm trying to figure out how that could be equated. That's, I guess, one issue I see with this. Thank you.

**DONNA AUSTIN:** 

Thanks, Sarmad. Dennis, go ahead.

spr4

So I think this guidance, we want to harvest all the learnings from operating variant TLDs as these become available and we want to apply the new learnings in a manner that does not disrupt current operations. So I appreciate Sarmad's point. As he was speaking, I was going through my head, oh, gee, if there are new tests and I happen to manage five TLDs, speaking as a backend service provider, for example, I'm managing five different TLDs from different TLD operators and one is transitioning out or in rather and I need to comply or conform to the new test and that requires changes to my bike and now I have to apply those changes to my other four customers, how are we going to manage that, right? And what happens to the existing registrations if they happen to impact second-level registration?

So I'm going through all that complexity without knowing the details as to what is going to happen in the next three years or down the road.

Maybe if we decouple capturing the learnings and what needs to be done from the actual implementation of those findings, perhaps we can find a way how this group puts a marker, we need to do this study, we need to find acceptable good practices, but then not talk about implementation, but that's something that through call of volunteers or some kind of consensus work, we can apply those changes in the future such that operators have ample time to think about how those changes will impact the infrastructure registrations and what have you. Again, I'm just thinking how do we—perhaps that's decoupling what we can do here. Thank you.

**DONNA AUSTIN:** 

Thanks, Dennis. Sarmad.

SARMAD HUSSAIN:

Building further on what Dennis is saying, and I guess agreeing with what he's saying, my thinking was that originally these were guidelines which were for registry operators and I guess RSPs as well, but they were guidelines or best practices which they can consider, but they were not, I think, intended as something which I can, should sort of quote unquote require. So, but I guess the new language is sort of leaning towards the latter kind of intent where I guess ICANN's role not only to just develop the guidelines, but actually to somehow require them. So, that's a slight change.

The other challenge is that since there's no clear technical way of implementing it, there will be multiple implementations and guidelines are good because then you can put them out and people can pick and choose depending on how they're implementing it and pick those relevant ones up.

But then developing a set of guidelines which are quote unquote required means that we are driving one, I guess, set of implementation rather than allowing for the variety of implementations to exist. So, that's also a challenge given that there is no one standard implementation out there from the technical community for IDN variants. Thank you.

**DONNA AUSTIN:** 

Thanks, Sarmad. Ariel, does this implementation guidance 3.9 relate to recommendation 3.7? Is that correct?

ARIEL LIANG:

Yep.

**DONNA AUSTIN:** 

Okay. And the intent of this guidance is that we don't know what we don't know going into the next round, but the intent is to do some studies so that for future rounds, the evaluation of the technical and operational capability could be different based on the experience of what's happened with the gTLD and variants that are implemented from whatever the next round might be. So, I think that's intent. So Sarmad, what you've raised is almost separate from, I know what you're saying, but I'm just wondering what happens with the change of an RSP or any critical function that's kind of outside what we're dealing with. So, I don't know whether there's a way that it can be picked up somewhere else, but I'm not sure it's within scope of what we're trying to do here. Ariel?

ARIEL LIANG:

Yes, I'm trying to decipher or kind of just understand all the comments. And I think this implementation guidance may be confused with another implementation guidance that's later down in this document that actually talks about the non-binding guidelines for the management of variant top level gTLDs at the registry registrar level. And this is only focusing on the potential criteria or tests to evaluate their technical operational capability. So that this is a separate thing from that management related guideline, although they are related, but this is only talking about

the criteria and tests. So, this only talks about next round, probably this won't be in time to be developed for the next round. But in a future round, if such criteria or tests were identified, then there's expectation to use that when evaluating the technical operational capability of the applicant. So, that's the intent of 3.9 and it's separate from the non-binding guideline. And I hope that helps clarify that.

**DONNA AUSTIN:** 

Okay. Thanks, Ariel. Okay. So, I don't know that we're all good on implementation 3.9, but I think we can move on and give folks time to think about this one.

ARIEL LIANG:

Okay. So, 3.10, again, the main change is the global wording change, and there are some slight kind of editorial revision to smooth the sentence, but the main point didn't change at all. So, that's 3.10. If no questions or objections from the group, I can keep moving. Okay. Thanks, Satish.

Okay. So, 3.11, again, it's a global wording change here, and then the leadership team proposed to put any other gTLD applicant who does not apply for variant labels in that round, just add other there to clarify. And then another thing I want to emphasize is the group had a lot of discussion about the four allocatable variant labels, and the agreement is not to change that number, despite the concerns raised by Org and I believe BC, but there are support from other commenters. So, this is no substantive change to 3.11.

And 3.12, again, no substantive change except for deleting IDN to make it future proof. So, it's the same thing as 3.11. And for 3.13, this is about the discount for a future registry operator only applying for a variant label. So, the revised sentence says, ICANN org will decide on the discount based on what it considers to be a proportionate blah, blah, blah.

And I believe there's some concerns raised by ICANN Org regarding it may necessarily not be discounted because the variant label evaluation may be also complex. So, there is a concern about the word discount here. And what the group agreed on is it's at the discretion of ICANN to decide what discount constitutes. So, there is a reluctance to change that word. Yeah, so that's basically what the change is. It's just to make the sentence flow better and also give ICANN org more power to decide on what the discount is and to clarify this point. So, I will stop here and see whether there's any comments. Also, Sarmad, Pitinan and Michael, please feel free to speak up if you still have concerns about this language. And I'm not seeing hands or comments. I guess it's okay.

So, 3.14, again, no substantive change here. It's just global wording change and also replace preliminary with final. And 3.15, there's no change actually. Even BC did raise a concern about this one-time exception, but the agreement from the group is it may be exaggerated because it's only a few registered operators that may be eligible. Oh, and something actually I do want to note is for 3.14 and 3.15, the agreement is that we still keep 2012 round and IDN in the language because these two recommendations provide one-time exception in the next round for the specific group of

registered operators and it's very limited to them. And therefore, to just be crystal clear which registered operators may be impacted is helpful to include in 3.14 and 3.15. And the global change regard to removing IDN 2012 round wouldn't apply to these two recommendations. So, I want to emphasize this and make sure everybody still recall this discussion.

So, any questions or comments? I'm not seeing any. So, my presumption is folks are generally okay with all these changes and for the rationale, I don't think we need to belabor all these updates. Basically, they're in line with what the recommendations we're talking about. Although the rationale for 3.5, 3.6 are not updated yet because we still need to agree on the language of the recommendation and we'll come back to this rationale part. But for the other parts, they have been updated. But 3.9 made me some further change based on what the group comebacks to our discussion on the criterion tests thing. So, I don't think I have to go through all these details and you will still have time to look at that more closely.

And then for the public comment review section, [inaudible] why certain things are changed based on public comment. And yeah, we kind of went through that while we went through the revisions. So, I won't repeat the same information here. And any questions or comments? We're okay to move on to the next section? And we have 11 minutes left. Just a time check.

**DONNA AUSTIN:** 

I wonder if given we're moving to a new section and people are having to drop, I wonder if it makes sense just to call it for today

and we'll pick up here next week if that's okay with folks. Okay. So, let's do that.

So, thanks for the conversation today. As I said, we'll come back to this, some of the sticky points, but we'll pick up from here next week. Justine?

JUSTINE CHEW:

Yeah, if I could just implore everyone to actually read through the document and come ready to discuss next week, that would be great. Thank you.

**DONNA AUSTIN:** 

Thanks, Justine. I appreciate we only gave you a couple of days to review this. So, I know many of you were seeing this for the first time. So, we will pick up from B5. I think it is the B5 next week. Okay. All right. Thanks, everybody. We will see you in a week.

## [END OF TRANSCRIPTION]