
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 25 April 2023 at 16:00 UTC

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JULIE HEDLUND:

Good morning, good afternoon, and good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group Call, taking place on Tuesday, the 25th of April, 2023. For today's call, we have apologies from Raoul Plommer, NCSG, Crystal Ondo, RrSG, and Catherine Merdinger, RrSG. They have formally assigned Juan Manuel Rojas, NCSG, Jothan Frakes, RrSG, and Essie Musailov, RrSG, as their alternates for this call and for remaining days of absence. As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails. All members and alternates will be promoted to panelists.

Observers will remain as an attendee and will have access to view chat only. Statements of interest must be kept up to date. Does anyone have any updates to share? If so, please raise your hand or speak up now. And please remember to state your name

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before speaking for the transcription. Recordings will be posted on the public wiki space shortly after the end of the call. And as a reminder, those who take part in the ICANN multi-stakeholder process are to comply with the expected standards of behavior. Thank you. And over to our chair, Roger Carney. Please begin, Roger.

ROGER CARNEY:

Thanks, Julie. Welcome, everyone. I think we've got a pretty quick agenda here. Just a couple updates. The small team met last week. And again, they're working on getting the codifying the current informal process. So when they're done with that, they'll bring that back to the group and we'll work on how that gets incorporated somewhere. So again, they met last week and had a good discussion last week. And they're planning to meet again later today. So we'll look for some more information from them coming out soon.

So other than that, I think I'll just open the floor to any of the stakeholder groups that may have had some discussions or want to bring anything forward that they've been having offline in this meeting and see if we can address anything that they've been working on. So any stakeholder groups that want to bring anything to the group.

I think to our agenda here, I don't think we had any fast at this time. I think we're going to go ahead and skip agenda item three and move into our Recommendation 27 items here. And I think Caitlin is going to walk us through what those items are here. So Caitlin, please go ahead.

CAITLIN TUBERGEN: Thank you, Roger. This is Caitlin Tubergen speaking for the record. And I am just going to pop this link into our chat so that everyone can see what I'm working on here. So Emily kindly prepared this Wave 1 Rec 27 working document. It's similar to all of the working documents that we've used in the past. But as a reminder to those who either weren't part of the discussion from Phase 1 or may have been absent that day, what the Wave 1 Recommendation 27 analysis report is in reference to is the work of the group from EPDP Phase 1 on registration data.

So that working group or EPDP team rather was charged with looking at all of the processing of registration data and providing updated recommendations to those based on the new data protection requirements under GDPR. And so there were some significant changes to the way that data or the recommendations for the processing of data.

That includes the data collected, the data transferred, the data retained and the data that's ultimately published. And so some of those recommendations were far reaching to other consensus policies and other procedures at ICANN. So Recommendation 27 noted that ICANN or we need to perform an analysis to show the impacts of other policies from the EPDP Phase 1 recommendations. And in Phase 1 A rather of this team's work, we looked at how some of those recommendations impacted the transfer policy.

For example, any reference to administrative contact in the transfer policy was something that would need to be updated

since the administrative contact is no longer required to be collected under the new recommendations for EPDP Phase 1. So that's just one example. So for what we have in front of us today are the analysis that affects Phase 1 or Phase 1B, what used to be Phase 1B, but really now what is the TEAC and the TDRP from the EPDP Phase 1 recommendations.

There's one item from the transfer policy and in reference to TEAC and there's five items that ICANN org identified in relation to the TDRP that deal directly with EPDP Phase 1 recommendations. So we'll go through those. The ICANN org team that performs this analysis either notes that there may be no impact, but they're just referencing for the sake of comprehensiveness. In certain instances, they recommend a path forward. And in certain instances, they're just pointing things out for future policy work to be done or for other groups to take note of.

So without further ado, we'll get into it. What you see here for section three point or issue 3.11 for the transfer policy, this is in relation to the TEAC and the team noted that section 1A 4.6.5 provides that both registrars will retain correspondence for any TEAC communication and responses and that that documentation needs to be shared with ICANN and registry operator upon request, which makes sense because in the event there is any sort of inquiry or compliance issue related to the TEAC under the transfer policy documentation would need to be provided.

The team noted here that this requirement doesn't appear to be affected by the recommendation in the new registration data policy, which provides that data elements need to be retained for a period of 18 months following the life of a registration. So that

shouldn't really impact the retention of documents for purposes of the TEAC. I'll be on the lookout for any raised hands if people have any concerns with the conclusions here or any questions as we go along. But I don't see any hands here. And I see Sarah says that this looks good. So we will. So thank you, Sarah. And Eric says the same. Thank you, all.

So we'll move on to the TDRP, the Transfer Dispute Resolution Policy. So item one is also in reference to the retention of data. So the folks that closely follow the work of the EPDP team may remember that the retention period, which is now 15 months following the life of the registration, plus three months to implement the decision, was actually taken from the TDRP. That's because, as we all know from studying the TDRP, there's a statute of limitations of 12 months to file a TDRP complaint.

And when the EPDP team was looking at this, they noted that it is feasible and allowable that a complaint may be filed on day 363, and that if the data was deleted in 12 months, that wouldn't be sufficient for purposes of the panel evaluating the TDRP, et cetera. So they said that because of necessity for filing a TDRP and having the requisite documentation, that the retention period would be 15 months plus three months to implement the deletion of that data, so 18 months total.

The point being that because this was based on the TDRP, that presumably this provision can still be maintained under the current registration data policy, since it's for 18 months. Obviously, if the group notes that this is too long of a period or that period needs to be changed, that would be something that would have to be

revisited. But does anyone have questions about the statute of limitations or concerns with keeping it as is?

I don't see any hands raised. I do note that Rick in the chat said that if the TEAC communications are switched to the naming services portal, then 3.11 might need revisiting. And we'll take note of that, Rick. That's a good point. Since we haven't officially solidified what those requirements would be, we would need to look at that again if things are changed. And that obviously would apply to all of these provisions. If there are significant changes, we'll just have to make sure that the recommended path forward wouldn't need to change.

Moving on to item two for the TDRP. This shows that certain sections in the TDRP specify complainant contact information that needs to be included in the complaint. And that, of course, may include personal data, which has certain requirements under data protection law. And the team noted here that processing of personal data that is not registration data will be covered in the data processing terms from recommendations 22 and 26 of the EPDP Phase 1 final report.

And just for reference, the recommendation 22 talks about how ICANN org will need to set up a data protection agreement with any dispute resolution provider. So obviously that would include the providers that administer the transfer dispute resolution policy. And recommendation 26 is about data protection agreements with contracted parties and how that data flows. So those two recommendations are still in the process of being implemented.

But of course, complainant contact information may not be, and most likely would not be, registration data since the complainant is no longer the registrant of the name. So that data would obviously need to be protected with data protection terms, and that's covered in recommendations that are currently being implemented. Does anyone have any concerns about point two here with the complainant contact information? Rick, please go ahead.

RICHARD WILHELM:

Thank you. Rick Wilhelm, Registries. This is not necessarily a question or concern, but maybe a question. You mentioned the issue of ICANN org entering into a DPA. What DPA would be entered into and how does the current situation regarding DPA negotiations and the progress of those impact this where we're making, we could be making policy that requires a DPA, yet there's presently challenges with getting a DPA done.

Are we setting ourselves up for disappointment by sort of saying that, well, we need to have cake at a birthday party, but yet we know there's no chance of getting cake because the bakery's closed. The metaphor does not really work, but it's close to lunchtime here in the Eastern time zone. I would like some cake. So is that something that we've considered when we're thinking here about the situation regarding the DPAs? Thank you.

CAITLIN TUBERGEN:

Thanks, Rick. I'm sorry that I don't have cake for you. And I also need to give the disclaimer that I am not privy at least the

conversations between contracted parties and ICANN org in reference to that DPA. In terms of the DPA from recommendation 22, I believe that's something that is in process. And obviously since the dispute resolution provider would be in possession of personal data and there would be personal data transferred through the complaints, that would be something that would need to be finalized.

And there's a recommendation that DPAs need to be in place. So I don't see any reason why that wouldn't go forward. Unfortunately, I don't have additional information on the DPA or the agreement or arrangement between ICANN org and contracted parties. I don't know if anyone on this call wanted to speak to that issue or have similar concerns.

I see there's others that want cake, but does anyone have any additional comments on Rick's concern or anything else for item two? We can note Rick's concern and see if we can provide additional information on that. I don't see any raised hands. I think we'll just put a pin in that for now. I see Sarah. Sarah, please go ahead.

SARAH WYLD:

Thank you. This is Sarah. So just thinking like, what are we actually doing here? As I understand, which I could be wrong, we're going through areas that have been flagged as that the new registration data policy might affect the transfer policy and figuring out what to do about those effects, I think. So here, indeed, there might need to be a DPA for that complainant information to be transferred. And indeed, as you said I don't think we can solve

that today. So probably it is enough to just like note it and be aware of it and then move on for the time being. So ultimately, I am supporting what you just said, Caitlin. Thank you.

CAITLIN TUBERGEN: Thank you, Sarah. And thank you for reminding everyone of the purpose of this exercise. So I think that what we could do here is just note that and support staff can go back and provide a draft. But note that the transfer policy review working group agrees or understands that data processing or that complainant contact information that's included in the complaint may include personal data and that the processing of that personal data is expected to be covered in the data processing terms in EPDP recommendations 22 and 26.

If people agree that something further is needed, you can add that to the draft text. But really, the items here were expected to be reviewed by the folks that are closest to the transfer policy and the TDRP. And that's this group of people. So if you either disagree with the conclusion, or think that something else is necessary, then now is the time to do that.

And by now, I don't mean as in this very minute, this is probably going to take a little time to digest, but there will be time if there are further concerns here, but we're just kind of noting what they are, and seeing if folks kind of agree with the general path forward. So thanks again, Sarah.

Item three. So TDRP section 3.1.41b references a copy of the WHOIS output. This is noted in the documentary evidence that is

to be annexed to the complaint by the gaining registrar. Noting of course, that copy of WHOIS output is no longer a relevant term. I believe we talked about this in Phase 1A as well. But I think what we did there is we changed any definition of WHOIS data to have the same meaning of registration data as provided in EPDP recommendation 24. This would include all data elements that were collected by the registrar.

And just for reference, I have here, this was the draft registration data policy that went out for public comment, and paragraph 3.6 provides the current definition of registration data, which is the data element values collected from a natural or legal person are generated by registrar or registry operator, in either case in connection with a registered name in accordance with section 6 of a policy.

I thought it might be helpful to just show that there is a definition, that the definition of WHOIS data is no longer included as part of this policy. So if the team is in agreement that makes sense to instead use the definition of registration data, we can support staff to provide what that would look like and we could see if the team is in agreement with that proceeding in that way. I see that works for Sarah. Does anyone have any questions, comments, or concerns about the proposal here to use registration data instead of WHOIS data? Thank you, Rick. I see a plus one there. I don't see any raised hands, so we'll move on to item 4.

Item 4 is also about documentary evidence. This is the documentary evidence of the losing registrar noted in 3.1.42c. This provides that the losing registrar is expected to provide a history of any WHOIS registration data changes made to the

applicable registration. And the group noted here that this requirement likely needs to be further defined as to what constitutes a WHOIS modification.

In other words, is this a change to public and or non-public data elements? And it may need to be revised to clarify the scope of history available to the registrar as it can only go back as far as the data is retained. And if the relevant data retention policy or use of the registration data, including TDRP, were disclosed to the data subject at the time of registration, this should cover such disclosure within the applicable period.

I know that was a lot of information, but it was just noting that it used to be that the losing registrar would annex a history of all of the WHOIS modifications to make out its case under the TDRP to show the evidence to the panel and that that might need to be thought of more broadly here. I see Owen's hand is raised, so I will give Owen the floor. Thanks, Owen.

OWEN SMIGELSKI:

Thanks, Caitlin. This is Owen Smigelski for the transcript. I just want to kind of also clarify something that we need there with number four, because it's talking about what constitutes WHOIS modifications change to public and or non-public data elements. So I'm not sure if that's referring to where there's an element that's being redacted versus one that's non-redacted. But that's assuming that there's something that's being actually displayed. The concern that could come up would be if the registration is using a privacy or proxy provider. Those would not necessarily be a non-public element. That would be privacy proxy customer

data. So we may need to look at that as well, too, which might have something to do with the dispute. Thanks.

CAITLIN TUBERGEN: Thanks, Owen. And just so everyone can see, what I've highlighted on the screen is the particular section of what the losing registrar needs to annex. It's item C, relevant history of WHOIS modifications made to the applicable registration. I think Owen brings up a good point, and I see that Rick is also in the queue. So please go ahead, Rick.

RICHARD WILHELM: Thank you, Rick Wilhelm, registries. Further to Owen's point, I think another question here is, does this relate only to information related to contacts, or does it also relate to host, AKA name server linkages? And does it also relate to things like term extensions or renewals? Because all of that data also shows up in the WHOIS for the applicable registration.

And so I think one thing that would be clarified macro would be, if it just relates to contact objects, those changes related to contact data, which would be one important thing. And then if it's within contacts, then it relates to Owen's set of questions about redaction and things like that. But I don't know to the extent that name servers are applicable in a TDRP, but that's something that's worth researching. Thank you.

CAITLIN TUBERGEN: Thank you, Rick. And I don't know off the top of my head. I think to answer that question, we would have to scroll down in the policy to see what the panel is asked to assess and base its decision off of. I see that Owen notes that sometimes name servers could be applicable to a TDRP. So it might be here it just says relevant history. And I guess that's in the context of what the losing registrar deems relevant to make its case.

Does anyone else have any notes about item four or how we'd like to define what that means or how to help clarify that in terms of the new registration data policy and the new rules that we're working under? In other words, that a lot of information is now redacted. So going to the public WHOIS may not be as informative as it once was. Rick, I assume that is a previous hand.

Don't see any further hands on that item. So we'll go to item five and support staff will take this back and think about some of the comments and maybe make a proposal or ask further questions if further information is needed from the team here. So item five is the last item in reference to the TDRP. And as you can see, there's a lot of information here. It's kind of a similar question.

So section 3.2.4 of the TDRP provides that a panel appointed will review all applicable documentation and compare registrant contact data with that contained within the authoritative WHOIS database and reach a conclusion not later than 30 days. So obviously, the authoritative WHOIS database is what the team is flagging here, noting that there's a couple of ways to approach that, or a couple of concerns here. So the ICANN org team that reviewed this noted that the purpose of the provision, at least

appears to be for the panel to validate information provided by the registrars.

However, it's not clear what source a panel would use as a basis for comparison with the registrar submissions under the new policy, since as several folks have pointed out, and as we've talked about, a lot of information is now redacted. So the authoritative WHOIS database or authoritative RDDS would not necessarily provide information that would inform the panel's decision here.

The TDRP provides for the panel to match what the registrars provide with its own lookup, and again that doesn't seem to be possible anymore unless the panel requests non-public data from the registrar in a similar manner as a UDRP provider would now use, which could result in duplicative data. Or the complaint only includes publicly accessible data, and the panel is able to request and obtain non-public data from the registrar.

It also notes later in the next paragraph that the group analyzing this could consider rewriting the section at a higher level to define what the panel's being asked to do, and that the specific steps regarding comparison of registration data sources may not be for the basis for the panel's determination like it once was. Instead, the panel may be asked to consider the facts and circumstances and evidence as presented by the complainant and respondent to determine if or whether a violation of the transfer policy has occurred.

I know that's a lot of information, but does anyone have any initial thoughts on how to proceed here? I am not seeing any hands or comments. I see Sarah. Sarah, please go ahead.

SARAH WYLD:

Thank you, yes. I understand that the suggestion is that we review the documentation around or the requirements, the policy, review the policy of what the panel is supposed to do to see, like instead of it saying the panel has to review the WHOIS data, it'll say the panel has to review all relevant evidence or something. That suggestion seems to make sense to me. I am open to that suggestion. Thank you.

CAITLIN TUBERGEN:

Thank you, Sarah. Do others agree with that or have another suggestion about what quote authoritative information or outside information the panel may want to consider that's not submitted directly from the complainant or respondent? Rick, I see your hand is raised. Go ahead.

RICHARD WILHELM:

Thank you. Rick Wilhelm, registries. I agree with Sarah. We might need to define it a little bit more because if there are retention requirements that come with it, we might need to sort of draw a little as opposed to saying broadly relevant. I agree with that in spirit, but as a practical matter, if there's specific retention requirements, we might have to be more careful about that. Thank you.

CAITLIN TUBERGEN: Thank you, Rick. Does anyone else have any questions? Jothan, please go ahead.

JOTHAN FRAKES: You can always count on me. Hi, I'm Jothan Frakes for the record. I liked Sarah's suggestion for potential amendment of text there, but I'd want to maybe inject the word verifiable for evidence. I think it's the circumstance where the dispute is going on between two registrars not suggesting there might be a -- sorry, it was a Caitlin suggestion that if there is a rogue party providing, I'm doing air quotes, you can't see, because I'm not using my camera evidence that you'd want some way to just corroborate that evidence in order to validate, because you're talking about a domain name that somebody has gone to the trouble of filing a dispute over. It's very likely it's not a small issue and you'd want to be able to verify that that evidence is in fact true as part of this process. Thank you.

CAITLIN TUBERGEN: Thanks, Jothan. I may have a follow-up question, but I see that Theo has his hand raised, so I will defer to Theo.

THEO GEURTS: So maybe I'm jumping the gun here a little bit. I lost a little bit of track of the conversation due to external factors, so to speak. But when I sort of envision the transfer dispute resolution and compare it with the UDRP, it's all about disputes. I think the entire

process is very similar to the UDRP. So why don't we just mirror those requirements and then we sort of have the solution to the questions here? Thanks.

CAITLIN TUBERGEN: Thank you, Theo. So if I can repeat what I'm hearing, I think that there were two tracks or two potential ideas noted in the Wave 27 working document. One was that TDRPs could be similar to UDRPs and that for those not familiar with the UDRP, when a UDRP provider notifies a registrar of a UDRP complaint, it will simultaneously ask a registrar to provide the registration information, certain parts of the registration information to the UDRP provider, in part to verify that the correct party is receiving that complaint, because sometimes the data is redacted or there's a privacy proxy service employed.

And so as of right now, and I know there's very limited TDRP complaints filed, there isn't a similar process that a TDRP provider uses to verify the information of the current registered name holder. So I think Theo is noting that in this case, the TDRP provider could do a similar verification process as a UDRP provider, so that there would be some sort of quote, as Jothan's calling it, verifiable evidence or authoritative evidence.

Or the second path, which is I think what Sarah was noting could also be acceptable, is instead of noting any sort of authoritative evidence or having additional data requests, look at the data that is submitted or the documentary evidence submitted by both parties, and have the panel make its decision based on what is submitted, rather than from an external or third-party source.

I think that's what I'm hearing, but if I am misunderstanding, please feel free to disagree in the chat or by a raise of hand. And I think it would also be helpful if we heard from others on what path seems to make the most sense. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you. Yes, Zak Muscovitch, I see both options. I guess between the two of them, I would prefer the one where there's a similar request made as with the UDRP with the verification statement. Because I'm just thinking that a responding registrar to a TDRP may not actually file anything and that could put the panel in a situation where it only has limited evidence as provided by the complaining registrar. And so this would provide the panel with all the, well, not all the information it needs, but at least a baseline of information that it needs. Thanks.

CAITLIN TUBERGEN: Thank you, Zak. That's helpful. Rick, please go ahead.

RICHARD WILHELM: Thank you. Another thing to think about is the transfer process has changed a little bit because the way the FOA works is different now as it relates to the transfer authorization code and just the way that the process works. And so we've been chatting a little bit among the registry reps about what, just sort of puzzling about what data are we talking about is going to be submitted or submittable.

So it might be worth a little bit of an exercise to think about in the context of the changes to the transfer process that are being proposed or are already part of the part A of this thing, what does that, how did those changes impact what data is available to for the TDRP to consume? So there's not really an answer there, but probably more, just more questions to ask. Thank you.

CAITLIN TUBERGEN: Thank you, Rick. You also raise a good point. And as I tried to note at the beginning of this exercise, this needs to be looked at in a comprehensive, but also it will be incomplete until, as you note, the final draft recommendations from that relate to the transfer policy and what documentation is needed, as well as what's needed for a TEAC, because there might be big changes there as well. So this is just an exercise for us to think about now, but no answers need to be carved in stone today.

But we just noted we had some extra time and wanted to float these to the group. So that will be part of support staff's role in reminding us that these are still there. And that we complete our holistic analysis of them before the report, the updated report goes out for public comment.

And to that end, I did just want to note that from the early written input that we received based on these charter questions, the registry stakeholder group did provide some information about how the issues identified in the Recommendation 27 should be handled.

And we do have registry representatives here. But I believe that the point of the input was that it's important to note all of the things in the REC 27 report and the appropriate group to make changes based on the issues identified is the transfer policy review working group so that it's appropriately placed here. And I also wanted to note that we had one of the questions was, were there any issues that were not captured in REC 27 that need to be considered? The registry stakeholder group didn't identify any additional issues.

The BC did note that there should be a recommendation for a registrant-initiated transfer dispute resolution procedure to address domain name theft. So we've taken note of that. And also for question J4, it says, should these issues or a subset of these issues be resolved urgently rather than waiting for the respective PDP working group? And I believe the registry stakeholder group noted that similar to its comments in the EPDP group itself, policy review should be undertaken by the GNSO council.

And with the specific issues noted in the transfer policy and TDRP from REC 27, the registry stakeholder group believes that that policy work should be happening in this group, which is why we're doing this now. So I just wanted to note those quickly. But back to item five, I see that Sarah had a comment. I do agree we need to think about how each step in the process could be documented with evidence. We're already thinking about that in reference to the TEAC, how to prove a phone call happened, et cetera.

I agree, Sarah, that's important to think about in terms of how a panel would ultimately make a decision based on how the current

world we're operating in works and what may have been possible pre-GDPR is no longer possible. So we need to make sure that the panel is enabled or empowered to make a decision based on what it has and what it currently has under the policy is no longer appropriate or needs to be added to. That's for this group to determine.

So is there any other questions about point five, about the registry feedback, about any of the points that someone may have had an epiphany while we were discussing in terms of REC 27 or any final comments on this before support staff takes a closer look at the feedback we received today and tries to make some draft text based on what we've heard? Please, Steiner has a question. Is the UDRP working in regards of collecting registration data? Steinar, please go ahead. I see your hand is raised.

STEINAR GRØTTERØD: This is Steiner for the record. I'm curious because we're kind of referring to the process that has been handled by the UDRP. So I was just like a short question about does the UDRP process work in these days when there are limitations of what is being seen in the public QAs or registration data services? Thank you.

CAITLIN TUBERGEN: Thanks, Steiner. I see Zak has his hand raised and he's very familiar with the UDRP. I think he can speak to that for us.

ZAK MUSCOVITCH: Yes, thanks, Zak Muscovitch. So Steiner, there's been two criticisms or concerns rather about the way the registrar verification statement is working in the UDRP. The first is that when it comes in to the provider, the provider requests it, not all providers are sharing that verification statement with both parties. And sometimes it's just being sent to the panel on the complaint. So that's one relatively minor issue.

The second issue, which doesn't really have any solution is that the verification statement shows the registration date or the creation date. And it may show when the domain name was registered at that registrar to that particular registrant, but it doesn't necessarily show when the registrant had registered it at a previous registrar. And so that second issue is probably just particular to the UDRP, perhaps. And that first one is a minor procedural issue. Those are the only two issues I'm aware of concerning that.

CAITLIN TUBERGEN: Thank you, Zak. Steiner, does that answer your question? I assume so, based on your response. Roger, I'm going to turn the floor back over to you because I don't see any additional hands. So if you have any questions for us or for the group that I haven't identified, please feel free to take the floor or if you'd also just like to close our call early, but I just want to give the floor back to you. Thank you.

ROGER CARNEY: Great. Thanks, Caitlin. And thanks for going through this. If there's nothing else, we can actually close the call. This was all on our agenda today. So we can give people some time back on their day. If everyone's okay and no other business. Excellent. Well, then we'll give everyone back almost 45 minutes. And we'll see everyone next week and we'll see the small team in a few hours. Thanks, everybody.

[END OF TRANSCRIPTION]