
ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 07 March 2023 at 16:00 UTC

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JULIE BISLAND:

Good morning, good afternoon, and good evening. Welcome to the Transfer Policy Review PDP working group Call taking place on Tuesday, the 7th of March, 2023.

For today's call, we have apologies from Theo Geurts, RrSG and John Woodworth, ISPCP. Theo formally assigned Jothan Frakes, RrSG alternate for this call and for remaining days of absence. As a reminder, an alternate assignment must be formalized by way of a Google assignment, my goodness, 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. Alternates not replacing a member should not engage in the chat or use any of the other Zoom room functionalities. If you have not already done so, please change your chat selection

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from host and panelist to everyone in order for all participants to see your chat and so it's captured in the recording.

Statements of interest must be kept up to date. Does anyone have any updates to share? Please raise your hand or speak up now. Rick, go ahead.

RICHARD WILHELM: Thanks. Rick Wilhelm, registry. Not really technically a statement of interest update, but I think it fits in now. I wanted to just let everybody know that for the registries, Carolyn Mitchell is our new alternate. And so you can see Carolyn in the chat there. And she'll be joining us. She replaces Beth Bacon who is busy in other stuff. And so Caroline will be joining us. And I think that she's going to be picking up for Jim Galvin during the one or two of the meetings during the ICANN thing. So she'll be at the mic a little bit more that. So just wanted to let everybody know that formally and to welcome Carolyn to the call. Thank you.

JULIE BISLAND: Thank you, Rick. And, okay. Seeing no other hands. Please remember to state your name 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 multistakeholder 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, and thanks everyone for joining this call this week. I know sometimes it's a little hard getting into the week before ICANN. So I appreciate everybody on making it today. So it's great.

Speaking of ICANN and leading off from what Rick mentioned, we do have two sessions, actually, later this week. You can call it later this week, I guess. On Saturday, our first session, and I think the plan has been updated a bit, and I think we'll continue our discussion that we have today on Saturday as well, and that'll be over the transfer dispute resolution mechanism. Yeah. So I think that'll be the plan for Saturday.

And then Sunday, we have a session as well. And, hopefully, now that we've covered TAC for a bit and then jumping into the TDRP, we're planning to have maybe a gap discussion to see if there's anything that's been identified that isn't working, doesn't have a policy in place. So that's the plan for Sunday. So, again, two sessions this coming weekend. Thanks, Emily, for posting those.

Also, some of you may have seen the early input request has been sent out. So to all the stakeholder groups, ACs and everyone else that looking for any early input on phase 2 discussion. So anything that people want to bring up on the dispute mechanisms that went out, I think, a week ago, maybe even a little more. But hopefully, that gets socialized, and please the members of this group socialized it within your membership. And maybe even bring it up at ICANN next week in your membership meetings if you're having them. So, again, that's the early input for phase 2 topics chartered questions. And I think that that's due back on April 4th so that we can start looking at any of

that and incorporate in our discussions. I think those are the big ones.

Emily, can we pull up the work plan? I think we're going to try to bring up the work plan every week just to make sure everybody's on the same pages where we're heading and what we're planning to work on. Oh, great. Thanks, Emily. Anything on here you want to identify, Emily? Anything big? Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. Hi, everyone. It's Emily from staff. So I'll note that we don't have any action items currently open. You'll see that today we're going to be talking about the transfer dispute resolution policy. And as Roger mentioned, we'll also be focusing some more on the TDRP during our first ICANN76 session, followed by this gap analysis on Sunday to look at potential areas where there's a need that's not being met by either the current TAC or TDRP.

Currently, we're scheduled in the sort of big picture to be looking at the combination of TAC and TDRP through June. And it's set up first as a bunch of conversations about TAC and then a bunch of conversations about TDRP. But I think what we're definitely seeing is that we might need to mix that up a little based on the outcomes of the conversations that ICANN76 and some of the needs that are identified.

So we'll be adjusting this work plan as that develops. But again, the big picture goal here is to wrap up this set of charter questions and any associated recommendations around transfer reversal by

early June. So I think that's all we have to flag here. And as I said, we'll continue to be showing this on a weekly basis so that everyone can contract where things are headed and how we're doing versus the big picture work plan. Thanks.

ROGER CARNEY:

Great. Thanks, Emily. And I'll also note, Jothan's chat message that the transfer will be also be discussed during the TechOps meeting on Sunday. And again, that's just any interactions. And I think that the transfer on Sunday in the TechOps will focus on some of the more solid things of phase 1a, but also anything that's left open in phase 2 as to any big ideas in there. Again, that'll be on Sunday afternoon. So thanks, Jothan, for posting that.

Okay. I think those are the big things. I'll open up the floor to any of the stakeholder groups. Any numbers that want to bring forward any discussions they've been having. And maybe as Jothan just highlight in chat, maybe highlight anything that potentially is coming up next week at CANN that is related to transfers. But I'll open the floor up. Owen, please go ahead.

OWEN SMIGELSKI:

Thanks, Roger. This is Owen Smigelski for the transcript. I just want you to know that during the regular Registrar Stakeholder Group membership meeting at ICANN76, there's an agenda item to go over the questions for phase 2. So we'll be discussing that. Hopefully, we'll be able to give some feedback later this month back to this team. Thanks.

ROGER CARNEY: It's awesome. Thanks, Owen. Okay. Great. All right. I think we can probably go ahead and jump into our agenda then and get the day going here. I think I may turn this over to Emily for a quick introduction into the working document for the TDRP. So Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. Emily from staff. So you can see in the chat, I've shared the link to the TDRP working document. We're going to just briefly go through the high level of the document, and then the focus of today's call after that will be some polling question that will hopefully help people just share some of their initial thoughts on this topic. So this is very much like many of our other working documents. We start with the current applicable policy language. In this particular case, the whole policy is applicable, and it's too big to cut and paste here. So there's a link.

Just at a very high level, some of the key points of the policy to refresh your memory. So the dispute may be filed no later than 12 months after the alleged violation of the transfer policy. And the complainant can either be a losing registrar where there's an alleged fraudulent transfer or the gaining registrar if there's an improper KNACK. The complainant will submit the complaint and supporting documentation to the dispute resolution provider, and then the respondent submits a response to the complaint within seven calendar days. The panel needs to reach a conclusion no later than 30 days after receiving the response from the respondent. And the resolution options for the panel are limited to either approving or denying the transfer.

And the other key point is that a TDRP does not prevent a registrar from submitting a dispute to a court of competent jurisdiction for resolution before the administrative proceeding is commenced or after it has concluded. So our main input that is available in terms of the TDRP are the survey inputs from the policy status report. The link is included in the document. And what we've done here is just extracted the comments that are most relevant to this topic from the survey.

So question 1 asked about the effectiveness of the transfer policy and the Registrar Stakeholder Group provided a response that dispute processes are a 0 and said that the dispute policy is ineffective and cannot be used at this time to reverse a transfer. Question 5 was about whether policy modifications have had an effect on the transfer experience. And one of the responses said that the processes are really complicated and a bad experience and that there's not an effective and efficient means to address fraudulent transfers. Question 6 asked about policy changes to protect registrants from domain name hijacking and whether that's been effective.

And I see Steinar is asking when the survey was taken. Let me just click on here and see if we've got a date on it. It was in 2018, Steinar. Sorry, question 6 was about whether policy changes have mitigated the threat of domain name hijacking. And one of the respondents said that the TDRP process does not help with domain name recovery. Question 19 asks about issues that customers are having.

So this is a question to registrars about their customers. One respondent said that there was a lack of good dispute

mechanisms, and another said that if a domain is hijacked, there's no effective dispute or resolution mechanism. And question 21 was about what the ideal transfer process should look like. And one of the responses said that there should be an effective and accessible dispute mechanism that puts the burden of proof on the gaining registrar and the requesting registrar.

So there's a few comments in response to the survey, and yes, it is a few years ago. But again, it's just one of the data points to draw in that says that there are some concerns about dispute resolution. Right below that, we've got polls from the dispute resolution provider websites, the cases that they've handled with respect to the TDRP, and you can find the links here to the decisions for each of these. As you can see, there's four from the ADN DRC.

All of them, I believe, are at least a decade old, so they've been around for some time. There's a few that are more recent from forum. Only four cases there as well. So it's a relatively limited pool, but it may be helpful for members to read through these and just see if there's anything that can be learned or drawn from them. The summaries are fairly short. You can also take a look at the annex 8.4 of the transfer policy status report, which includes some summaries of the cases from the dispute resolution providers' websites.

So on this topic, we have just a few charter questions. And the core of the question is really about whether the TDRP is doing its job and whether it's sufficient. So that's kind of, the G3 is the core of this. And we'll be doing some polling questions to dig into this a little bit more. But some of the specific questions, one is about is

there enough information available to determine whether the TDRP is effective? And if not, what additional information is needed?

We'll note here that Holida presented the results of compliances digging into data from 2020 through 2022 to see if there were any compliance cases that we could supplement our dataset with, and she came back to let us know the compliance found no valid cases initiated during that period in which the registrar referred to the TDRP and related obligations. So that doesn't give us necessarily a whole lot of additional information from that perspective.

And Owen is saying that he remembers one compliance case from 2014. I will mention that that Holida did note that there were some places where I believe there were cases where it was reportedly related to TDRP, but once it was investigated, it wasn't actually a valid case with respect to TDRP, so I should have that clarification as well. So that's something I think we'll dig into a little bit more in the polling questions.

G2 notes that the ADN DRC said to the IRTP Part D working group that in some cases the parties to the case didn't provide enough information to support arbitration. And so that's something that the working group may want to consider whether there's something that needs to be examined further in terms of the policy. So do there need to be additional information, more materials, or other supplemental recommendations needed to help make sure that the right information is being provided in these cases.

And to support that discussion, it would be helpful for everyone to review section 3.1 and 3.2.1 of the transfer dispute resolution policy, which specifies the information that needs to be complete included with both the complaint and the response. So a little airplane reading for folks to take a look at that. Again, here G3 is sort of the core of this, which is about whether the TDRP is doing its job. And if not, what else is needed. We'll be talking about that a little bit in the gap analysis. G4 and G5 are about requirements for the processing of registration data, and whether those are complying with data protection law and appropriate based on principles of privacy by design and data processing minimization.

And I think I'm going to call on Caitlin to provide a little bit more context on these two specific charter questions for those who might be less familiar with some of the discussions around registration data retention. Caitlin?

CAITLIN TUBERGEN: Thanks, Emily. This is Caitlin Tubergen from support staff for the record. As many of you know, when the first EPDP team on registration data and the temp spec went to review all of the data elements that contracted parties are required to collect, display, retain, etc., they went through a long exercise on that. And I just wanted to highlight an important piece which I believe Emily has the document. Thanks Emily. The registration data policy was posted for public comment a while back.

And I wanted to draw the group's attention to a section of that draft policy relating to retention that is relevant to this group. And specifically, paragraph 12, which you can see on your screen,

notes the transfer dispute resolution policy specifically and says that registrar must retain those data elements necessary for the purposes of the transfer dispute resolution policy for a period of no less than 15 months. So what's important to note here is that the retention of registration data hinges on what is necessary for the TDRP.

So when the group reviews those data elements that are necessary for a TDRP claim, and that's, of course, to make the claim and to respond to the claim, what data elements do you need. Do you need to know who registered the name, what their contact information was, how they were contacted, etc.? And the group will review that.

But I wanted to note the importance of this that in the event that the group decides that there are windows down the data elements to very little that does have ramifications outside of the transfer dispute resolution policy. Because what the data that registrars are required to retain is used in certain scenarios. For example, if there is some sort of failure of a registrar, and that portfolio of names needs to be transferred to a new registrar, that data that's retained would be sent to the new registrar to reconstitute the contact data for those registrants.

So I wanted to just flag that briefly. And the conversation will happen later. But those questions need to not be looked at in isolation if that makes sense. That it is more far reaching than just what's contained in the transfer dispute resolution policy. Because it does hinge on this for the draft registration data policy. Happy to answer any questions about that. But I just wanted to

highlight that before the group continues discussing this. Thank you.

EMILY BARABAS:

Thanks, Caitlyn. And I'll just note for those who are making note of additional items to review in the TDRP, the relevant sections of the TDRP to look out with respect to these chartered questions, G4 and G5 are 3.1.2 and 3.1.4, which are the information submitted with the complaint and the additional documentary evidence provided by the complainant. So please do take a look at those, and that will support the conversation on these charter questions. So that's an overview of this document. Roger, would you like to head over to the poll and kick off some primary conversations about people's initial impressions about the effectiveness of the TDRP?

ROGER CARNEY:

Thanks Emily. First, I'll open up prying questions on this. If anybody has anything specific, Emily can help on or Caitlin. I point out what Caitlin's, I won't call it an intervention, but lead into that. The EPDP team did discuss it in detail, and honestly, it led over into the IRT work. And the IRT discussed that 15-month retention and what that is and what data is part of that. So I think it is important.

And again, as Caitlin mentioned, we're not going to talk about it specifically now. It's just one of those items in charter that does have effect on other policies, and we will need to delve into that pretty deep and make sure we get that correct. So just something

to sit and back your mind and think about as we talk about other things. And once we get to that, we can pull that up. Rick, please go ahead.

RICHARD WILHELM: Thanks, Roger. Rick Wilhelm, registries. Just to be clear, the registries and the TERP are very low involvement. But this is more maybe a facilitation thing before we get into discussion about the effectiveness of the TDRP. Is it documented somewhere what the goals of the TDRP are? Because if we're going to talk about effectiveness that seems to be in the context of what the goals are.

Is it stated that they are just to sort out issues where the two registrars are arguing about a transfer dispute and there's no other, like, this is the last resort if they can't work it out? Is that the stated goal and the effectiveness is really whether or not this is useful in settling those goals as opposed to it doesn't have stated goals of either reversing or failing to reverse transfers? So these are kind of clarification things. Thank you.

ROGER CARNEY: Great. Thanks, Rick. I assume that was kind of preemptive for GM because I assume GM will back you up on that question of what is the purpose, what is the goal of the dispute mechanism. And thanks staff for bringing this up in here. I don't know if the specific goals are laid out. Exactly, Rick. But the purpose of the mechanism is to resolve a dispute.

And as you mentioned, that resolution isn't necessarily a reversal or whatever it is. It's just to resolve it holistically. It's not too state that it has to go one way or another, but I don't know. Maybe I buried and can't remember far back in history or field if the IRTP even went through that the specific goals of those mechanisms or not. But the general goal is, yes, to resolve a dispute between.

Again, it's hard to say that it's between registrars. I think that's who is facilitating it at the time. And again, it's one of our charter questions to answer. And I think some of the comments came in on the survey saying, is that the right people. But really, it's the dispute between a registrant and what happened to that trend or what happened to that domain. Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. This is Emily from staff. So my history doesn't go back far enough to know this off the top my head, but we can definitely take an action item to go back through some of the historical documents and see if there was any documentation about specific goals. I did want to say I think that there might be different levels of goals here for the group to think about. So there may be the question of, if the case is raised through the TDRP, is it effectively reaching conclusion? That could be the most granular question. Right? There could be the question of, if there's a dispute, is it resolving the dispute? It could be the question of, if your domain gets hijacked, is this effective for resolving your problem.

And I think at ICANN76, we're going to be talking about the sort of gap analysis. And I think the goal of that is to look at the broader

question of if you are right, and Sarah is saying is the process accessible to domain name owner. So the broader question of kind of if you have a problem and you're a domain owner, do you have the right ways to resolve your problem. That might be the bigger, broader question that we'll maybe talk about somewhere in the context of unmet needs or gap analysis.

It might be helpful to look at some of the more granular questions first about the functioning of the TDRP in the context of the more sort of narrow interpretation of its function. Because I think maybe that will help to inform some of the conversations that we'll be having an ICANN76 about sort of broader gaps in the system that people might be seeing. Does that make sense?

ROGER CARNEY: Great. Thanks, Emily. That makes sense to me. Do you have any questions on that, Rick? Steinar, please go ahead.

STEINAR GRØTTERØD: Yeah. Hi. This is Steinar for the record. I just have a question. The transfer dispute resolution policy, is this something that the registered name holder can sort of initiate without the cooperation between either losing or the gaining registrar? My thinking is that there might be a scenario where the registrant do have a connection to a registrar. That's for sure. But if none of these, neither the losing nor the gaining actually want to go into the process of submitting this to the transfer dispute resolution panel, what will then happen? What sort of tools and action can actually

the registered name holder take? Thank you. It was a purely question for my understanding. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. I'll give a short response, but I'll let Zak go first. Zak, go ahead.

ZAK MUSCOVITCH: No. Please go ahead, Roger.

ROGER CARNEY: Yeah. Okay. And today, I think that's one of the big questions that we're left with, Steinar. It technically has to come from the losing registrar to initiate this. Obviously, that is a registrant-initiated process. But to your point, I think that that's one of the questions that has come up about the policy, is that the right starting spot? Is it the losing register? And should there be more flexibility for the registrant to demand or get that initiated. So just my thoughts on it. Zak, please go ahead.

ZAK MUSCOVITCH: Thanks, Roger. Zak Muscovitch. So a few thoughts and also in response to what Steinar had mentioned. So the first thought is the surveys from 2018. And I suspect that the answers from the registrars would be substantially similar. Perhaps the only metric that may have changed, and I seem to recall some data being discussed in the working group about it, is that one of the possibly

inadvertent offshoots of hiding public WHOIS data might be less instances of hijacking overall. I'm not certain about that.

But regardless, we know that hijackings occurs. We don't have any specific data about it, because no hijacking occurs with my registrar, right? But from being in the industry I see that it happens occasionally with some regularity. I think everyone knows that it does happen. And I see it happening from my perspective in the court system when there's a registrant goes to court, files a lawsuit to recover the domain names. If the registrant doesn't have trademark rights and terms correspond to the domain names, it makes it more complex. The lawsuit, of course, in a US federal court, can be very expensive even if it's undefended.

And I note that in the registrar transfer dispute resolution policy itself, the fees at least at the ADN DRC are 10000 United States dollars, which is substantially more than a UDRP procedure, which is 1500 to 2000. And so the steps that registrant would have to take to see this dispute resolution policy provide a remedy for stolen domain name would be initially to convince their own registrar to try to resolve this failing, which try to invoke the transfers resolution policy.

But it seems to me that it's a high heeled the client to convince a registrar to pay 10000 bucks to invoke the dispute resolution policy. And it's rarely used because for the most part, these things are informally settled. But also the price point and the fact that a registrar can't directly access it is also I think reflected in the survey comments with the dissatisfaction of the policy.

And thinking this through, and I've raised this previously in the working group, I think there should be some consideration given to a different approach that involves the registrant itself to initiate a transfer speed resolution procedure. That would save the registrant from having to expend considerable funds on going to court if that was the only feasible outcome as a result of an uncooperative registrar or unclear circumstances, which didn't allow the registrar to roll back the transfer, etc. And I think that the fees should and quite easily would come down if we use a UDRP model for this.

Now that being said, even if there were such a new policy to be considered, that won't solve all disputes about alleged stolen domain names because sometimes the person who's accused of being a thief would say I paid good money for this. I have the paperwork, etc. And so in those cases, court would likely be the only form for resolution.

But that being said, in many other cases, I would think probably the vast majority of cases, the thief doesn't respond to the legal proceeding. And so, therefore, there's some optimism that the policy if it could be initiated by a registrant would take the burden financially and otherwise off the registrar, put it on the registrar, give the registrar some ability to handle the process itself and would be effective in a majority of cases in all likelihood. Thank you.

ROGER CARNEY: Great. Thanks, Zak. Berry, please go ahead.

BERRY COBB:

Thank you, Roger. Berry Cobb, for the record. So just a couple of things here about some of the discussion I've heard in some of the points made in the chat. The TDRP in of self, and I think, Roger, you've been asked a question if I recalled from IRTP days, I think, really, the only major shift was moving the operation of the TDRP to a third party dispute provider, whereas I think it used to be more responsibility of the registries at the time. And as Caitlin noted in the chat, that group did consider maybe not very detailed whether this should move down to or be made available to registered name holders. That part I don't recall, and Caitlin is probably a little bit more intimate about those deliberations.

What I do want to say here though is this group should always keep in mind the charter questions that are bringing us here. And Zak's intervention, I think, are very interesting questions. I'm not so sure about a change of making this available to registered name holders is exactly within the scope of this working group. That's not to suggest that this working group could create a recommendation to the Council to explore that a little bit further. Because that really changes the whole dynamics of the TDRP the way it's situated today in that there's a contractual relationship between ICANN and the registrars for the conduct of that TDRP, whereas there's not a direct relationship to registered name holders. So that's something to consider.

And I think finally, the idea about, should there be some sort of accreditation? I don't have an opinion on either side of that, but due taking note that even despite maybe the cost on ramp here for conducting a TDRP, it's still very infrequently used. So

accreditation while maybe a very good topic, I'm not a 100% certain that was at least within this charter scope. To conclude here, I just want the group to be mindful of about some guardrails within the charter on some of these other topics when looking at this review. Thanks.

ROGER CARNEY: Great. Thanks, Berry. And thanks for the reminders there as well. Zak, please go ahead.

ZAK MUSCOVITCH: Thank you, Roger. Zak Muscovitch. So, of course, Berry is correct that this working group has no mandate pursuant to the charter to pursue the development of a new transfer to speed resolution policy that can be initiated by registrants. That would be another working group and another process entirely. However, if the overall issue in the charter as concerns the existing transfer dispute resolution policy, whether it's effective and fit for purpose, satisfactory, etc., that is certainly within the mandate of this working group.

And as Berry suggests, in fact, it is the ultimate question about policy. And if the working group believes that it is not satisfactorily performing as the feedback from that survey from the registrars indicates, as I suggested in my own comments, then by all means, the working group should recommend that an alternative be found. Thank you.

ROGER CARNEY: Great. Thanks, Zak. Okay. Any other comments or questions before we jump into our polling questions here? Certainly the polling questions will mimic a little bit of the discussions we've already had, but give everybody some time to think about themselves. Okay. Steinar, please go ahead.

STEINAR GRØTTERØD: Hi. This is Steinar again. Sorry for the questions. Isn't the shorter question G3 in the TDPR, isn't that an opening for having the discussion and that may end up with a recommendation that the registered registrant do have some sort of way into using this policy for solving a dispute one way or another. Why does it have to be a new working group looking into that kind of path? Thank you.

ROGER CARNEY: Thanks, Steinar. Yeah. And again, I think it's touching on what Berry said. It's not a specific charter question to redevelop or create a solution if we find it. And I think it is kind of the iffy thing is, yes. It doesn't afford us to pursue a path. I think it's the prudent thing for our timeline and our resolution to what our charter is. If we see that it's insufficient, recognize that and lay that out so that someone can take it on to develop that. I don't think the expectation of the charter was to develop that. But to identify if it was or not.

And again, I think Berry was trying to hedge that and say, it didn't seem to be in scope. So I think that that's the important thing. If we get to that spot, as Zak mentions, it seems like some of the

survey leads to that and his thoughts lead to that. But we need to work on that process before we get to that spot anyway.

I think it's the issue of, can we make it fit into our charter that we do that? We probably could shoehorn that in, but I think the responsible thing is, let's identify, and if it is an issue to recommend to Council to take a deeper look into that specifically. Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. Zak, Muscovitch. So it's just in regards to Steinar's question. I think that actually Steinar is correct that if this working group were able to add a word into the policy to say, for example, registrars or registered name holders, and everything else remain the same and maybe a few tweaks here and there to accommodate that change, I think that could conceivably be within the working group. Because that's what we've been doing with other stuff to date.

But I think that there would be so many material differences in the nature of the proceeding and the evidence that's required in the procedures if it were to be a registrant triggered policy in addition or in substitution of a registrar triggered policy. And so that's why I had assumed that it would need to be in a different working group on that basis. Thank you.

ROGER CARNEY:

Great. Thanks, Zak. Okay. I think we can go on and jump into our poll questions. And, again, we'll be discussing this for a while. So, again, I think that we'll hit on all these topics. And our poll

questions are going to actually, again, touch on some of these. So let's go ahead and jump into that so we can get our discussion moving. Julie, thank you. All right. So the first poll question. Again, just the active members need to respond to this. And if there's any questions about the question, let's answer those before we actually complete the poll on that question. So if you want a little more information on this, please ask before we move on.

First question, as it currently stands, do you believe the TDRP is an effective dispute resolution mechanism? Right at to the heart of the question here. Any comments or questions on this before we jump in? Okay. Please take a few seconds to answer, and then we'll discuss. Okay. Julie, can you show us the results for that?

Great. Okay. Yeah. I think with even our brief discussions that we've had this morning, I thought that this is the direction this would go. One or two people thought, yeah, it does work. And even if it needs us some small tweaks, it's working. But the majority of the people think that, yeah, this is not working in its current form, so we need to address it. So I think that's good. Any questions or comments from the group on this? Jothan, thanks. And I think that's fairly. I thought the same thing when I was looking at it. So I think you can answer the question on the last two bullets. Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. This is Owen Smigelski for the transcript. So I voted no. Not because I didn't think it was effective in that I think it

can be a very good process for taking care of transfer disputes. I just think it's just not efficient. The fact that it's not being utilized or so a few cases. There's the expenses involved with it. I think that's what makes it not an effective policy. Thanks.

ROGER CARNEY: Great. Thanks for that, Owen. Steinar, please go ahead.

STEINAR GRØTTERØD: Yeah. I also voted no. But I'm just curious about who voted yes and have some feedback from those who voted yes. I think that maybe in my understanding is that the first thing is this is a dispute policy that will be actionable upon if the losing or gaining registrar can't agree and solving this internally. And that's mainly the only yes argument I see. I'm just curious about what's the argument of saying this is effective? Thank you.

ROGER CARNEY: Great. Thanks, Steinar. So anyone that voted guest that wants to answer that, please feel free to. And I think that's the hard part too, Jothan, is it effective? And I think that when you look at it and say, well, no one uses it, so is it effective? And it's like, well I'm not sure that that's the answer. The first sentence of the policy, I think, states something about, if the registrars can't mutually resolve it, then it goes to the dispute mechanism. So I think that when you look at it and the number of transfers and how many actually get disputed, and then how many, again, this big funnel, then how many aren't being resolved by the registrars prior to that.

And then finally get to this spot. It may be a pretty small number to even begin with.

Okay. I don't think we have anybody interested in that. So let's go ahead and jump to question 2. Thanks, Julie. All right. Is the current statute of limitations for TDRP appropriate? In other words, is 12 months from the date of the alleged improper transfer an acceptable deadline to file a TDRP complaint? Sarah, please go ahead.

SARAH WYLD: Thank you. Hi. This is Sarah. I already voted and I immediately regretted it. So are we assuming that the TDRP is the only dispute task for a transfer that is a concern or are we expecting that there is some other policy potential path for this process? Because I feel like that would change the answer. Thank you.

ROGER CARNEY: That's interesting. So, yes, it's an interesting question that you bring up. And I think that-- oh, sorry. Emily, please go ahead.

EMILY BARABAS: Roger, you answer it your way, and I'll tell you what I think.

ROGER CARNEY: Yeah. And again, I'll just start with what I started with. What I mentioned on the last question is obviously, the first step is trying to mutually get to this. And I think that transfer dispute, again, I'd like to think of it as one policy, especially when we started talking

TAC stuff over the last couple weeks. To me, TAC is just a part of the transfer dispute process. And I think that to get that moving as this timeline correct. And to Sarah's point if we come up with multiple paths, I think that that timeline to me is within those multiple paths. It's not a timeline for each one. So it's an overall timeline. Is that right? Is the 12 months right for it? But that's just my thought. Emily, please go ahead.

ROGER CARNEY: Yeah. I would agree with you, Roger. I think first looking at the TDRP as it is today in the context of the way that it functions today and then using the gap analysis to talk about potential additional mechanisms. And then we can always come back to these questions depending on the results of that discussion. Thanks.

ROGER CARNEY: Great. Thanks Emily. Hopefully, that helps, Sarah. And we'll take into account your quick voting ability there. So, again, is the 12 months right, so that you could initiate the transfer dispute within 12 months of it occurring. So, yes. No. Could be longer. Could be shorter. What are your thoughts on that? So please go ahead and vote, and we'll discuss it. Okay. Julie, do you want to show us the results?

Okay. So it didn't seem to get a whole lot of support on being longer than 12 months. But obviously a few people thought it would be good. Shorter seemed to be the bigger response here, but there was a good turn for keeping it to the current length as well. And I think that even when we talked about the TAC over

the last few weeks, we had that same idea of the timeline. And obviously, we came up with some exceptions to TAC timeline and things like that if we were going to shorten it. And I think that that's what you would look at here. Is it appropriate for the majority of the cases?

And again, if 55% of the people here think, oh, yeah, it should be shorter and then we have to delve into, okay, what is shorter? Is that six months. And again, the shorter you make it, probably the more exceptions that occur to that. So just some things to think about. But I want to open it up to anybody that said, no. It should be longer or shorter. And maybe give us some ideas of why that should be so that we can maybe narrow it down to an appropriate timeline. Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks, Roger. Zak Muscovitch. Also for words worth, I'll share my rationale for saying no, it should be longer. And I did have some difficulty with arriving at an answer. And I'm not stuck on my answer, no, it should be longer. But the thought that I had was that although the one-year fixed time period is a nice and a tidy period and it seems generally workable, the concern I had was that there's legal principle of discoverability that often is used to trigger a limitation period.

So in some instances, a limitation period doesn't begin to run from when the wrong occurred, but rather when it was discovered to have occurred. And so I was thinking there could be situations where a registered name holder doesn't realize that they've had their name taken without authorization until beyond the 12

months. And so in that kind of situation, I think that there could be some consideration of a longer period, but in any event, that was my rationale. Thank you.

ROGER CARNEY: Great. Thanks, Zak. Catherine, please go ahead.

CATHERINE MERDINGER: Thanks. This is Catherine Merdinger. I was actually thinking, just in response to that, why it shouldn't/can't really be longer. My thought process was the last second that you could transfer a domain name registration. Right? It's like when it's, I don't know. It's after it's like their term is over. I don't know all the words. But I'm thinking you always add one year. So you could potentially be adding just one year with the transfer and have no extra time whereas if you transfer it 6 months into your registration, you have 18 months left once you transfer it.

And so I was thinking at the last second, if you transfer it, you have maximum, I guess, minimum, you have 12 months. And so if we wait until after, if we say that the statute of limitations is longer than months, that domain might have deleted. And, like, how do you get it back? It's, like, run its natural course.

And so I was thinking I thought 12 months seemed reasonable because you're going to have at least 12 months of that registration as a result of the transfer, but I could also be convinced it could be shorter. But I don't think it can be longer, given that the domain might have expired. And then what are you

supposed? There's no, like, recourse there. Right? Does that make sense?

CATHERINE MERDINGER: Yeah. That does make sense, Catherine. Okay. Any other comments on that? Zak, please go ahead.

ZAK MUSCOVITCH: Thanks. Yeah. I mean, these are not full boiled thoughts, shall we say. But just thinking about Catherine's great comments there. I get the point that if the name's expiring before a 12-month limitation period rather, then the procedure wouldn't be effective. But that actually could just be a limitation on the length of time. So let's say that the limitation period was 10 years, just for example, and the name had expired prior to the commencement of the procedure.

Well, that would just mean that the procedure can't be used in that particular case because the name had been expired. But if the domain name was still registered 10 years later, just for example, then the procedure could be properly invoked. So the way I tend to look at it is that the expiry of a domain name prior to the commencement of one of these proceedings would render the procedure useless. But it's not necessarily tied to the length of a limitation period. Thanks.

ROGER CARNEY: Great. Thanks, Zak. And it's interesting when you get into those timing things. And as Catherine was hedging the bed on the one

year extension, and if it was close to expiration or within that timeframe of, okay the grace period after and then you extended it, and then for some reason, you couldn't get to renew it or whatever then it expires and goes to auction, it does get tricky when you start talking about that timeline. But, again, I think, again, once you start looking at that, you you're talking about the extreme or the extremes that we always talk about the number of occurrences that this happened. Jim, please go ahead.

JAMES GALVIN:

Thanks, Roger. Jim Galvin, registries for the record. And ding, ding, ding, magic word said time for a Galvidian question? No, but in all seriousness, when we start talking about these timeframes and what should the number be, and why should the number be one thing or another, it just brings me back to the question that Rick had put on the table way back in the beginning. And that is what problem are we really trying to solve here?

Because any number that you pick is going to have a variety of different downstream consequences. And so it's hard to know which number to pick until I know for sure what problem I'm trying to solve and what I'm focused on, because there'll always be bad guys who'll gain any number. I mean, no matter what number you pick, the bad guys will just game out the system to take advantage of that number.

So it can't be that you're trying to protect yourself against bad guys per se, or protect yourself against abuse per se. You're trying to give the registrant an opportunity to protect themselves. The rest is you get what you pay for and you get what you do. I don't

know. Anyway, that's my concern. And do you really know what problem you're trying to solve? It's hard to know what number to pick. Because there's always reasons to do it or not do it. Thanks.

ROGER CARNEY: Great. Thanks, Jim. Jothan, please go ahead.

JOTHAN FRAKES: Yes. Thank you, Jothan Frakes, registrars. Yeah. So I think there's an interrelationship here with the dispute mechanism and how long this should be available that ties into the locking periods of the domains. I think there's a period of time during which a domain maybe isn't eligible to transfer or is eligible to transfer after the creation or transfer of a domain name. One thing to step back, and I think that Jim does a really good job of being principled about this, is what is the problem we're trying to solve? One attribute that we do not track that we might want to consider tracking is the date of the last transfer when it's gone in between registrars.

One of the challenges that we had in historical efforts on the transfer dispute, and I noted this in the chat is the washing of a domain where registrar A has a name transferred away from the registered name holder to another registrar, registrar B, and then subsequently transfers it to registrar C. The mechanism and remedy for registrar A to help the registrant becomes severely diminished with each registrar that the domain subsequently moves to.

And one attribute that we could be tracking is the number of times that a domain is transferred in the last two years or the date of the last transfer that could help inform these processes to ensure that they are more secure and protected while retaining some of the aspirational frictionless desires of making sure that the domain registrant has the ability to move around if they need to. But those types of attributes of data could inform us more about maybe these locking periods and maybe these dispute mechanisms. Thank you. That was the idea. Thank you.

ROGER CARNEY:

Great. Thanks, Jothan. Yeah. And I think that those are important things that take the in consideration when you're trying to look at a dispute. As you mentioned, we set the clock to a 30 day clock on transfers. And as you just pointed out that could be 6-7 transfers within that first year of the TDRP saying you get a year to do it. So I think that's it. It's something that needs to be looked at. So Steinar, please go ahead.

STEINAR GRØTTERØD:

Yeah. Hi. This is Steinar for the record. Well, maybe Jothan Frakes answers here. But my thought and my understanding was that the time period for when you can actually enter the TDRP is from the date of the transfer when it successfully transferred from A to B. But if it's then being retransferred again to another registrar, we have registrar C or maybe D and E, etc., who are actually the parties here in this? Who will be on the panel, so to speak, and argue. That's the thing. And there's one thing I also think I'd like to have clarification on. This can only be used when

there is a transfer dispute. If the registrant is not happy with whatever service to the new registrar, etc., this is not the process to solve that lack of satisfaction. Thank you.

ROGER CARNEY:

Great. Thanks, Steinar. Yeah, it's good to point that out. And I'll just comment. I saw something in Chat, and I honestly haven't been able to follow chat completely here. But I think Caitlin put in that this was changed from 6 months to 12 months back in the IRTP days. And the question is, why was that done? What was the logic of extending it from 6 months to 12 months?

And I think someone wrote in chat, did we see any changes to it? And I think those are all important. And, again, I wasn't following chat completely. So maybe that got answered, but those seemed pretty relevant as well. Absolutely, typically, Rick you're right. I would say that is rapid transfers is an indication of an issue. Emily, please go ahead.

EMILY BARABAS:

Thanks, Roger. I dropped something in chat to hopefully flush out a little bit of the IRTP party working groups' rationale for that recommendation. And maybe it's helpful to just put that into the record as well as for folks who are reviewing the transcript later. So they looked at the 6 month period that was in place at the time and felt that that might not be long enough to notice that a transfer had taken place, a disputable transfer, and therefore, would not be enough time for them to notice and take the next steps to contact their registrar and initiate the dispute.

And in making their decision to recommend a 12-month period, they looked at the registrant's obligation under the WHOIS data reminder policy to contact the registrants annually, and noted that extending to a 12-month period might be desirable in that regard because receiving that notice might trigger them to realize that there was an issue.

And they also stated in the report that the extension could mitigate multi hop transfer problems by providing [01:06:03 -inaudible] registrant with additional reaction time to inquire with their registrar after they didn't receive their annual reminder to update their contact information. And they felt that it wasn't unnecessary burden for legitimate transfers. So that was the rationale that they provided for changing the number from 6 to 12 months. Thanks.

ROGER CARNEY: Awesome. Thanks, Emily. Jothan, please go ahead.

JOTHAN FRAKES: Yeah, thank you. So as much effort as registrars put in and it is substantial to make sure that these notices get to the registrant. We're verifying that they have a reachable email address. We still find registrants even upon receipt of those notices identifying that they don't or having those fall victim to spam filtration. I think that was aspirational, but I don't know if the reality matched the brochure on that notice being an appropriate mechanism. Thank you.

ROGER CARNEY: Thanks, Jothan. Okay. Great discussion. Any other comments on that? And, again when we look at updating name language or anything, we'll have to come up with that compelling reason to get everybody to agree. Oh, yeah. Hey, 6 months does make sense. It's so much better than 12. Obviously, the status quo here is the 12 months. So it's stacked that we're looking at, is there a path to make that different. And again, it could be longer, it could be shorter, whichever way. But the idea is start thinking about does it make sense and should it be shorter or longer or whatever it is and what is that compelling reason.

Okay. I think we can go ahead and move on from this one and go to the next question. Okay, great. Thanks, Julie. What do you believe is the main factor that results in the low number of TDPR filings? The cost of the filing. Registrars work out issue before it actually hits a dispute. Length of time between the filing and panel decision. Not sure. Or have questions on it or whatever. All, three, Owen. Yeah. Okay, any questions or comments on this? Does it make sense? Sarah, please go ahead.

SARAH WYLD: Thank you. Hi. This is Sarah. I selected other here kind of as an all of the above. I think the process is complicated. I think some people don't know about it. I think sometimes the costs are prohibitive, or confusing, or complicated. So it was just difficult to pick any one of those reasons. Thank you.

ROGER CARNEY: Perfect. Thanks, Sarah. And I think that you're getting a lot of support on too as well, Sarah, in the chat. Okay. Let's go ahead and answer this, and then we'll just jump into the discussion on it. Please take some time. Okay, Julie. Let's go ahead and see what the results were. So after Sarah explained that I think a lot of people put in the other, and I assume most of that is because it is complicated and may hit multiples there. Jothan, please go ahead.

JOTHAN FRAKES: Yeah. I mean I think we kind of flash mobbed other and made it into all the above. But I wouldn't want the number here to be indicative of if somebody had answered other not intending it to be all the above. Is there anybody who answered other that literally was other and not all the above?

ROGER CARNEY: Or some of the above.

JOTHAN FRAKES: Yeah, exactly.

ROGER CARNEY: And again, the interesting part of this question is what do you feel is the most responsible? And it's not necessarily trying to get to 90% responsible. But which one is the heavy weight here. Maybe it's only 20% of time, but you feel like that's the most other reason. It will take too much time, Jothan, add that to do that. So we'll skip

that. And again, I think the interest thing is just getting the answers in the discussion going around it. So I think yes, I think all these things play a part, and we all know they play a part. But does it help us lead to any other outcomes for the process.

Okay. I think we can move on to our next question, please. Okay, fourth question. Currently, only registrants have standing to file a TDRP. Is this appropriate or should registrants also have the ability to file a TDRP claim? Again, something we just discussed prior to you jumping in and do the poll questions. And it's definitely a league from one of our chartered questions. Jothan, please go ahead.

JOTHAN FRAKES:

Thank you. I didn't necessarily know how to answer here. I mean, I definitely think there are registrants who should have some sort of a dispute mechanism. But it's very different from this. One of the reasons I think that it was made available to registrars and only to registrars was that we could help filter and support and work with our customer or a grieved customer or former customer in recovery of their name where possible.

But it's very qualified. What can really happen? And there's a lot of things that need to happen as prerequisite steps before this could actually kick in. The hope was, again, aspirational/brochure version of what this would look like was there would be friendly amicable universal interest on behalf of registrars to help one another to get the domain back into the hands of the customer.

And what we found in reality was that the customer always wants to have that name back regardless. And there were circumstances where that was a legitimate transfer that couldn't be rolled back or there may be a mitigating circumstance on the gaining registrar. And these issues are very complex. And it's challenging to explain that to the average person who isn't as familiar with the nuances of our registration business as to what rules or things needed to happen. So if there were a separate dispute mechanism for a registrant for this purpose, it should be made available to the registrar. But as is, these are probably best for registrars. Thank you.

ROGER CARNEY:

Thanks, Jothan. And Sarah, plus one you there. And as Sarah was chatting earlier as you start your discussion, I saw that you guys asking and answering the same kind of question. It's interesting. And I'll let Zak talk here in a minute, but Zak brought this up as well. And if we're talking about TDRP, maybe it is appropriate that it's just only registrar because that's how it was designed and there's something else designed for registrants or whatever it is. But to Sarah's high-level question, is it supposed to be encompassing of the registrant as well? And maybe that's not the case or maybe it should be the case. Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Roger. Zak Muscovitch. Yes, I agree with your comments, Roger, and also Jothan's remarks as well. But from my understanding, this particular policy wouldn't be suited for a registrant to make payment procedure. It would have to be

different, the evidence would have to be different, etc. So from that perspective, one could say that it should remain with only registrars who can file the first option.

But I would actually select the second one. Registrant should also have the ability to file claim just so that there's a record of the registrant should have a procedure. But also, it doesn't say file a TDRP claim. It just says file a claim. And so that's why I would pick number two. But in any event, I think a lot of people understand that maybe registrant should have the right to file, but maybe it's not this particular procedure.

ROGER CARNEY: Great. Thanks, Zak. Steinar, please go ahead.

STEINAR GRØTTERØD: Yeah. Hi. It's Steinar for the record. Looking at the recommendation, we ended up with the Phase 1a is that there is at least the way I can see a scenario where there are elements in a recommendation that do have some sort of unanswered process that most likely will have to be at least we refer to it. It has to be sold in the transfer dispute resolution policy. So if we are answering this purely based on the present policy, it might be argument as Jothan and Zak are doing.

But I'm with my At-Large hat on, I do find it kind of, and I don't like a dispute process or policy light version and fitted for end users. I think we have to make sure that the end user and the registered name holder do have a smooth and easy way to solve a dispute even if it doesn't have the cooperation with the registrars involved

in the transfer. And it was a red flag signaling here with the light version of it. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Okay. Great comments. I think we'll just give everybody a couple more seconds to answer, and then we'll pull up the results. I think everybody's has a good idea there. So let's just give it a couple seconds. And Julie, can you show us those results? Okay. So I think that and, again, I think as people describe this and as I talk through it, the idea of remaining as registrar doesn't mean that there isn't a registrant option. It's just that the TDRP as envisioned or as currently looked at is a registrar kind of mechanism. But Owen, please go ahead.

OWEN SMIGELSKI: Thanks, Roger. I didn't want to chime in before the voting ended. But I will now. I voted for that should be something that registrars only do, and this is not because I'm with a registrar. It's because I think these policies at when contrast would say something like the UDRP requires significant registrar participation. So for UDRP, really all they basically need to know is, who is the registrant? Anything else that's needed for that dispute processes all external trademark laws, etc., stuff like that, rights. But to in order to file a TDRP, a lot of is based upon internal registrar documentation and stuff like that. And so you need to really have the participation of the registrar involved. So that's one reason.

And also, another reason is there's a lot of shady people out there on the Internet. And if this is something that is allowed to be done

by anybody, I'm just concerned that that could be then another vector of abuse for hijacking, taking over somebody, make some claims, fake some evidence, documents, stuff like that. The actual registrant or the registrar don't have the time, effort, or money to defend. And then somebody with big pockets could steal a domain name through this type of process. So that's just my concern is all about allowing it out. There is more just a security and an involvement of a registrar perspective. Thanks.

ROGER CARNEY:

Great. Thanks, Owen. Thanks for that. Any other comments on how you answered or how you wanted to answer, or now that people have talked about it, maybe you're thinking differently? Zak, please go ahead.

ZAK MUSCOVITCH:

Yes. Zak Muscovitch. Thanks, Roger. So just in response to Owen's comments. Yes, I agree. Those are all significant issues that would come up in designing a registrant-initiated procedure. And in fact, there's analogies to those same issues with the UDRP. But nevertheless, it is something that should be considered because there are solutions available and they should be investigated. For example, in the UDRP is registrar participation through the provision of the registrar verification statement as a result of the temp spec.

So that's like one kind of analogy case of a registrar indirectly participating in the procedure. Of course, in a case of a stolen domain name, IP logs, etc., that kind of evidence would have to be

provided somehow. Perhaps a solution is available with some discussion consideration of that. And in terms of enabling bad actors to initiate the procedure, there's a concern with that in connection with the UDRP too, but there's safeguards and procedures that could be considered to alleviate that concern. Thank you.

ROGER CARNEY: Great. Thanks, Zak. Jothan, please go ahead.

JOTHAN FRAKES: Yes. Thank you. Jothan Frakes, registrar. So the thought here that I'm hearing and I definitely believe that registrants do and should have rights in this discussion, does the intake or having some consistency to the intake of a claim at the registrar or former registrar, does that satisfy the need for registrants having an ability to file a claim? In essence, they are filing a claim coordinated with their registrar, which they should have in every event. Is that going to satisfy that registrants do have the ability to file a claim or is there something beyond that that that we need to discuss or define? Thank you.

ROGER CARNEY: Thanks, Jothan. And I would think that to Jothan's question, but not trying to answer it or anything, but I think what I've heard is that the intake and process by the losing registrar is not the same fulfillment of the registrant having a path. And again, why those would have to be different? I mean, obviously, registrant not agreeing with their registrar's outcome or solution or suggestion.

So I think that the question still stands as should there be a separate path for registrant. And I think that we're getting to that spot where the TDRP is a registrar process and that I think that this question added on to that is, should there be the registrar path as well.

And to Jothan's point, I think that you have to look at that. And, again, not trying to answer that question. As Zak mentioned that probably is too in-depth for this group to get into. But does that help feed into a registrant path and that they they've had to have at least tried to get it going through and discussing it with their registrar prior to taking it to a different path. And then again, not trying to solve that, just throwing that out there.

Okay. Let's go ahead and jump into the next question then. Probably our last question for the day. Thank you. Are the current reporting requirements appropriate to enable future review of the TDRP? Like, talking about data. I think that one of the questions I was thinking of as we were answering the other questions is if registrars resolve a dispute amongst themselves, should that be somehow recorded so that it's known that there was a dispute? Something like that. Just throwing it out there. Okay. So are the current reporting requirements appropriate for future review? Yes. No. I'm not sure. Take a few seconds to answer, and we can jump into that. Zak, please go ahead.

ZAK MUSCOVITCH: Oh, it's okay. Let's do the vote first. Thanks, Roger.

ROGER CARNEY: Thanks. Jothan, your hand is up. Please go ahead.

JOTHAN FRAKES: Yeah. Yeah. Yeah. So thank you. Jothan Frakes, registrar for the record. So the context around this, what we're pulling on right now in question 5 is whatever we're doing to report the data that's only available on any measurement of this is where a TDRP actually comes into play. And there's the stuff that falls outside of that, which is not recorded. So there's no metrics. I think we discussed this earlier. It's like it's difficult to measure this. So what would this look like as far as measurement? And would this introduce compliance reporting requirements or obligations on registrars to report when they did do a resolution of something like this. Is that the correct context, I guess?

ROGER CARNEY: I would say so. Yes, Jothan.

JOTHAN FRAKES: Okay. Okay. Thank you.

ROGER CARNEY: You bet. Okay. Let's take a few seconds and answer, and then we'll take a look at them. And thanks Emily for that in chat. So anybody wants to take a look. Okay. Let's go ahead and pull up the results. So a pretty good split compared to our other questions. Or not sure. I think there's valid here. I think that this is a good question of answering or looking for the next set of

questions. Okay. You know, outline, as Emily just mentioned in chat, the only reporting is really the publication of the results. And should there be another set of questions to delve into on that? Jothan your hands still up. Is that new or old?

JOTHAN FRAKES: Sorry about that. That was an old hand.

ROGER CARNEY: Oh, okay. No problem. Thanks. Okay. And I think we are running out of time here. But again, I think that when you look at this and it's and it's a question we've asked multiple times throughout this year plus discussion we've had already is, do we have enough data? Should we be collecting more data to help the future or to show that it's working or not working? So always an important question they asked.

But I think we'll stop there with the questions. We have a few more, but we'll just start those up on our Saturday session. So, hopefully, I'll see some of you on Saturday. Others, I'll see you online, hopefully, on Saturday. So have a great week, and we'll talk to everyone on Saturday. Thanks.

JULIE BISLAND: Thanks, Roger. Thanks everyone for joining. Safe travels if you're traveling, and this ends our session.

[END OF TRANSCRIPTION]