
JULIE BISLAND:

Good morning, good afternoon, good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group Call, taking place on Tuesday, the 10th of December, 2024. For today's call, we have apologies from Owen Smigelski (RrSG), Ken Herman (NCSG), Catherine Paletta (RrSG). They formally assigned Essie Musailov (RrSG), Bolutife Adisa (NCSG), as their alternates for this call and for remaining days of absence.

As a reminder, the alternate assignment form link can be found in all meeting invite emails. 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.

All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only. Please remember to state your name before speaking for the transcription. And as a reminder, participation in ICANN, including this session, is governed by the ICANN Expected Standards of Behavior and the ICANN Community Anti-harassment Policy. Thank you. And over to our chair, Roger Carney. Please begin, Roger.

ROGER CARNEY:

Great. Thanks, Julie. Welcome, everyone. Getting down to our timeline here, just this week and next week, I think, and then we're off until January. So we've got two meetings. And we have some work to do, but I think our speed is going to pick up here because there's a lot of comments in the last few, or very few comments in these last few

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recommendations. So I think we're in good shape, but I'm hoping we make good progress today.

So I think with that, I'm not going to delay our work anymore. So I'm going to turn this over to Caitlin to walk us through where we left off and forward. So, Caitlin, please go ahead.

CAITLIN TUBERGEN:

Thanks very much, Roger. This is Caitlin Tubergen from ICANN Org. As a reminder, we had completed our review of the Change of Registrant Data recommendations last week. We started on the Group 2 recommendations. We had gotten through two of those. The first couple of recommendations in Group 2 deal with the Transfer Emergency Action Contact. We left off on recommendation 31. So we will start with that recommendation.

As a reminder, recommendation 31 has text related to additional communications with the Transfer Emergency Action Contact. As the group was talking about this, they noted that there is a current policy requirement regarding initial contact with the TEAC and when the response needs to come through, but subsequent communications are not provided for or there are no requirements. So in recognition of that, the group recommends that once that initial non-automated response from the TEAC occurs, the gaining registrar must provide additional communications to the losing registrar at least every 72 hours until work to resolve the issue is complete. And that's just so that the losing registrar is apprised of any progress with the issue.

So for recommendation 31, we did receive a comment from Leap of Faith. The concern here is that there are going to be instances where the matter isn't closed and that for issues that are pending for a long time, there needs to be a way for a gaining registrar to mark the issue as closed, even if it's not technically closed. And the example that was given in this comment is that there are sometimes situations in the real world where the issue will be escalated to an external venue, such as a court, and that the gaining registrar should be no longer required to provide updates every 72 hours if the issue has been escalated outside of ICANN processes.

So what you'll see here in the text that Christian is providing on screen is two updates based on the feedback from Leap of Faith. The first is, per all of the recommendations that we've been going through, any mention of calendar days has been changed to just hours for the sake of consistency. And then you'll see a bracketed sentence at the end. This language wasn't provided directly from Leap of Faith. It's just something that support staff put in here as a discussion point and just says if the issue is escalated to an external venue, such as a court, the gaining registrar is no longer required to provide updates every 72 hours. But I see some hands are raised. And so I will turn it back over to Roger to manage the queue and discuss this proposed edit from Leap of Faith. Thank you.

ROGER CARNEY:

Great. Thanks, Caitlin. Before I get into the queue, just one comment here. Excuse me. I think we had the discussion about this and that it may go to a court system or whatever it is. And I don't know that there

was any feedback that we talked about anyway about closing this loop. But I always thought that the gaining registrar would be able to close it at any point by saying we're done discussing it. So I think that, you know, I don't know if we need to add language in that allows the loop to be closed, but just something to think about. So, Rich, please go ahead.

RICH BROWN:

Yeah, Rich Brown for the record. Yeah, I'm going to piggyback off of what you just said there. First of all, I want to state that we're adding requirements to a process that doesn't exist. This is for informal transfer dispute discussions between registrars. That's what the TEAC is for. And the gaining registrar has the ability to say we're done. This matter is closed at any time because there is no requirement for them to return a domain or look any further into a transfer dispute other than responding to the initial TEAC request. This is simply adding more that if communications continue, they got to keep at it until the case is closed. That is all I want to say there. Thank you very much.

Oh, so bottom line, I don't think we need to change it and adding, you know, the unless there's a court case or whatnot. Once again, gaining registrar can say we're done. This went to court. We'll leave it at that. Yeah, that's all. Thank you.

ROGER CARNEY:

Great. Thanks, Rich. And I think one of the, and I agree, I'm not sure this language is needed. The one thing I thought about with this was how would we even know? I mean, again, like you just said, Rich, it's not, the gaining registrar doesn't actually have to tell us that it's done that or

anyone, tell anyone that it's been done to court, and maybe they don't even know. So I'm not sure that that language helps. And again, this is once they've responded, it's an informal process to for the dispute. So as Rich mentioned. So but Rick, please go ahead.

RICK WILHELM:

Thanks, Roger. I think that the plus one to the comments that both you made, Roger, and that Rich made. Yes-and-ing that, I would like to say that I think that this is the existing text is okay. It stands because as I'm highlighting here in the document, and it's appearing on screen, the current text already says until work to resolve the issue is complete. And so if it would be escalated to an external venue, that is one example of it being resolved, because that means the immediate issue is now complete. And so that means that the so-called additional substantive updates by email, which would be required every two 72 hours, are no longer required.

So I think that the text is written okay, as it stands. And I don't think it would benefit from this additional clarification, because the additional clarification would add confusion, because, oh, well, does it mean that there are other circumstances that would require an update for longer? And would that mean that it's not considered resolved if it's escalated to an external venue? That would, to my mind, an escalation to an external venue would be a resolution to the issue. That's essentially another way of phrasing what Rich was saying. So I would reject this comment. It'd be okay to clarify somewhere in the rationale that there's a way of closing the issue. Thank you.

ROGER CARNEY: Yeah, okay, I think unless someone objects, I think we can not put this additional language in with the response to the commenter that the gaining registrar can close this loop at any point after their initial response, or even during their initial response, they can close that. So, I think that the loop there is there, and maybe they just didn't understand that and we can provide that information. So, okay, thanks Prudence and Jody in chat. Okay, I think we can move to the next one, Caitlin.

CAITLIN TUBERGEN: Thank you, Roger. So, the recommendation 32 is about the method of communication with the TEAC, and this was a recommendation that was made actually after a discussion that happened in person. I believe it was in Washington, D.C. But essentially, the recommendation here notes that there might be other ways of communicating with the TEAC. But ultimately, if there is a phone call or verbal communication or something that occurs outside of email, that verbal non email communication must be accompanied by an email to the TEAC, and the email timestamp starts the clock for the response timeline.

So, we received two comments in relation to this recommendation, and both comments essentially suggest the same thing, which is that email is not a secure method of communication. There's a lot of room for disputes and uncertainty, and there's no independent or neutral third-party validation to email. And so, the commenter is suggesting that rather than relying on email, that ICANN should consider using or

adapting an existing centralized communication system for registrars, similar to the current registration data request service or the RDRS, which is essentially a ticketing system, and use that so that it would be neutral and more authoritative than email.

So, with that, you'll see that we've drafted up some language to consider this text for the group to discuss. But basically, instead of email, there's a mention of a centralized portal managed by ICANN through which registrars can communicate with one another via the TEAC. But I will pause and hand it back over to Roger to manage the queue. Thank you.

ROGER CARNEY:

Great. Thanks, Caitlin. Yeah, and I think maybe there was just a misunderstanding here that the communication, the email was just a clock starter, not the preferred communication. I think we specifically said that something about, you know, this could be, you know, first contact could be by phone, but, you know, it has to be followed by an email just saying the clock has started. And all communication could be by phone after that. The email was just to start the clock. So I think maybe that was just maybe a misunderstanding or not quite understood completely. Rich, please go ahead.

RICH BROWN:

Yeah, Rich Brown for the record. Wow, a couple things on this, just getting my thoughts together on it. First of all, the TEAC governs an informal process, therefore ICANN is not going to create a system to

support something that doesn't exist. So that's my like right out the gate on having some sort of ICANN message system.

And to follow up on that, while over the last couple years and whatnot, as I've been getting more and more into ICANN, I keep hearing about centralized messaging systems and whatnot and there's a lot of positive, a lot of negative to be said about it, the bottom line is it's something that's not really immediate. And so let alone the right policy around it seems kind of hard as well. So I'll leave that there as far as the wanting to change this to an internal communication system.

Now, as far as the TEAC contact point, that is still locked behind the ICANN system. So it's not like it's available to public or this communication information is just there for anybody. It is set by the registrar so they know where this contact is coming from. And two, that allows other registrars to get an exact contact with who they need to contact at the other end.

So yeah, I just can't support this update. I think we just need to leave it as it originally was because I really don't see this update really helping in any way. Thank you.

ROGER CARNEY:

Great. Thanks for that, Rich. Rick, please go ahead.

RICK WILHELM:

Rick Wilhelm, Registries. One, I agree with the points that Rich made. Secondly, I thought the, well, also, we've got to remember where the idea of email came from. Email came because we wanted, and the

transcripts of the discussions will show this, we wanted something that was trackable and more traceable than a phone call because there were timings, very careful timings involved in this TEAC process. And so that's where the idea of email came from.

And third, I thought that we had considered and rejected the idea of a system around this. And one of the reasons that we rejected it is because this situation simply does not arise that often. And the overhead of building some sort of a system implementation to support this simply would not be justified due to the relatively low frequency with which the TEAC is exercised.

And then the last item is that the criticism leveled by the comment is related to the security of the communications, but that's an unfair criticism because this is an operational point of communication between contracted parties who do business by email a lot. And while there may be security risks related to email, coming in and criticizing this particular means would mean that there'd be perhaps some overall criticism of using email for any communication between contract parties, which is unwarranted. And also because there's no indication there'd be important or super highly confidential data being exchanged in this TEAC contact, this is supposed to be bringing up the fact that, hey, we don't think that this process went according to plan. And this is an emergency, so let's get together and work on this. There's nothing to indicate that super highly confidential data is going to be exchanged via this communication.

So I think that's enough reasons. We might be up to five there, but I think I can probably let go of the club that's pummeling the poor horse. Thank you.

ROGER CARNEY:

Thank you. Yep. Thanks for that, Rick. And yeah, and you're right, we did discuss a centralized system. And I think you hit on the main reason. I think there were other reasons we didn't support that idea. And again, I think maybe it was just maybe a misunderstanding that the email was just the clock starter and most likely, you know, the communication will be via other ways. And your point on security is spot on as well. Thanks for that, Rick.

Jody, please go ahead.

JODY KOLKER:

Thanks, Roger. I mean, this centralized system, I just don't think the juice is worth the squeeze for this. You know, it's going to take development to get it done, and I don't think we're going to have a better system. Because if an email comes in or somebody reports it to ICANN, what happens then? I mean, to the gaining registrar, does the gaining registrar get an email to say, come and check out the portal? Or do we just have to have, does every registrar have to have someone that's checking the portal every hour to see if something new has come in? It seems like you'd have to have an email come from the portal to warn the registrar, the gaining registrar that the TEAC has started. So I think we're still in this email situation. Like I said, I'm not sure the juice is worth the squeeze here. Thanks.

ROGER CARNEY: Thanks, Jody. Yes, exactly. So, okay. I think that, unless anybody has an issue, I think we'll continue with our original language and provide back to the commenter the discussion we had here. And again, maybe it was just a misunderstanding on how that got used. So Caitlin, I think we can move on.

CAITLIN TUBERGEN: Thank you, Roger. So moving on to recommendation 33, this is a reminder about this recommendation, which is in relation to the transfer dispute resolution policy. So one of the things that the working group discussed was considering opening the TDRP to registrant filers because currently the policy is worded in a way that only registrars can utilize this dispute resolution mechanism.

Ultimately, the working group made a recommendation for the GNSO to request an issue report or other suitable mechanism to further research and explore the pros and cons of potentially expanding the TDRP or even creating a new standalone dispute resolution mechanism for registrants who wish to challenge improper transfers. The last sentence notes that the working group recommends that this is an effort that could be resource intensive and will require the council to consider the appropriate timing and priority against other policy efforts.

So there were several comments that came in about this recommendation. Several were in support. Some of the registrar commenters noted that they're very much in favor of looking at expanding the TDRP due to the cost and the fact that registrants are

unable to utilize this mechanism. The comments note that it should have a low price tag, allow registrants to file, and also expand the criteria to cover an invalid transfer that's due to compromised registered name holder data. And as we all know, the current TDRP looks at clear violations of the transfer policy. So if the transfer occurs in accordance with the transfer policy, if there was a compromised account that wouldn't necessarily be a violation of the transfer policy, that would be a different type of violation not covered by the TDRP.

There were a couple of commenters that supported the overall recommendation but noted that the last sentence about being resource intensive and appropriate timing and priority, that sentence may be true on its face, but ultimately registrants rights need to be considered and authorized transfers need to be considered. And it's a very important issue irrespective of how resource intensive it might be.

One commenter suggested adding the sentence, which you'll see in the yellow box, there remains a need for an intermediary mechanism to remedy unauthorized transfers between terms of service clawbacks and litigation as well as other issues as may be identified by the GNSO. So we added that so the group could see it.

ALAC provided a comment that they don't believe that an issue report is needed, that this working group could recommend expanding the TDRP to registrant filers. However, if that's not agreed to, obviously the ALAC supports further work on this.

And then there were two comments that believe the recommendation should be deleted. Essentially, the commenters note that they strongly

oppose any sort of extra judicial procedures for handling transfer disputes. This opens the door to potential exploitation and ownership changes without proper due process. Also, there is already a lot of volunteer burnout. So to create another PDP seems undesirable. And then the commenters note that this is when the transfer policy and TDRP were originally created, the court systems may not have been familiar with these types of disputes, but as time has gone on, courts should be very familiar and are the appropriate venue to handle these. And therefore, there should not be a further work on potentially expanding this.

Oh, and then I think the other thing is rather than expanding the TDRP, what the group should be focusing on is how to make transfers more secure and look at the suggestion for the push-based mechanism rather than the current TAC method. So with that, I see there's already hands raised. So I will turn it back over to Roger. Thanks, Caitlin.

ROGER CARNEY:

Thanks, Caitlin. And real quick, as far as the ALAC comment on expanding TDRP, I don't think expanding TDRP to the registrant solves the issue. And I think we had that discussion. The TDRP is very procedural and can actually get a transfer gone through following the policy cleanly, even though it wasn't something that should have been done. So I think that we had that discussion and we decided that this would be a better option. And again, we're not recommending a new transfer mechanism or dispute mechanism. We're recommending that council examine that idea. So I think that the other issues, I think, kind

of dissolve because we're not recommending this. We're saying that we see that there's a possibility and the council needs to decide that.

As far as the last sentence here and the additional sentence, maybe both of those are useful information for council and maybe it doesn't belong in the recommendation and it's just, I don't know, as a footnote or whatever it is. Maybe that's more appropriate, I don't know. But I'll leave it there and go to the queue. So Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. And this is Theo for the record. So there's actually a lot to unpack here. I'm not going to do that. That's going to cost me half an hour, I guess. But on a couple of points here, this is a request for the GNSO. And if there's an issue report for the GNSO council to consider if this is worth their time, that's their decision. I don't think that should be up to the community here, but up to council.

Then there's the comment that we should focus on a more secure transfer process. I think the transfer process is already very, very secure. It's all the other stuff that could play a role in domain name theft. That is something you cannot fix with the policy on a transfer process, which is already good. It has a key. It's a secret key. So that's already very well done.

Well, I did sort of stumble in the first initial recommendation at 33. What a compromised domain name was stolen. I get it compromised and Caitlin already sort of gave a little bit of the information about compromised registration data. So I'm not sure if that is actually required if there's compromised data and how that plays into stolen

domain names. But when I read compromised domain names, I was on a very different track due to other discussions within the ICANN community who also use compromised domain names for very different purposes. Thanks.

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

STEINAR GRØTTERØD: Hi, this is Steinar for The Record. You may understand when I'm saying this is At-Large baby, so to speak. I think we have kind of a unique chance to have the registered name holder the possibility to be part of a TDRP process. I don't think we should actually be kind of vague saying that if the GNSO think that's a good idea, let's do it within this policy. I think we should be more strong and say we actually believe that this is the time for enabling the registrant to file and involve being involved from day one in the chance to dispute resolution.

I know that when we first, when At-Large first commented this, our thinking was that we should say when the registered name holder should only have the possibility when there is a breach of the transfer policy itself in the things that we have discussed and we kind of will likely agree upon in the different processes and so on.

But in the way we've been working now and the text now is also including compromised and stolen domain names and that is a little bit more tricky. So maybe some sort of a compromise that we give the registered name holder the option to be included in the TDRP when

there is a breach of the transfer policy itself and take landscape of compromised and stolen domain names into the second phase whenever that comes. Thank you.

ROGER CARNEY:

Great, thanks for that, Steinar. And I'll just add to that. TDRPs almost are always—and I'm going to say probably above 99% of the time initiated by the registrant. The one issue I think that we discussed was if the registrar doesn't feel the obligation or whatever you want to say to pursue it or to fight it then the registrant is kind of left out. So again I think the registrant always initiates this but to your point Steinar they may lose a little I don't know the power or whatever you want to call it as it goes on because it's up to the registrar to fight and maybe that's something that should also be looked at but thanks for that Steinar.

Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks very much Roger, Zak Muscovitch. So just looking at the comments, and I'm looking at the comment review tool there seems to be very strong support for an expansion of the TDRP, strong support for looking into the consideration we'd expand the TDRP or creating a new dispute resolution process. There's also a comment there that and so I think generally there's been very positive and strong feedback for a recommendation such as this.

Where I think there is some more attention that could be paid is in the last sentence of the initial report language which seems a little bit you

know almost shameful like that we don't want to make too much work for the GNSO Council, we know they have other priorities, but would you kindly take a look at this? And the BC comment which I was part of drafting pointed this out that and I'll quote from it, while this may all be true, in the context of ensuring fairness for registrants who currently have no effective means of dealing with unauthorized transfers, the issue is of paramount importance to registrants and deserves equitable priority to issues that primarily affect other stakeholders. So I think we should reconsider whether we need to have this kind of caveat at the end which almost invites the GNSO to second guess this working group's recommendation. Thank you.

ROGER CARNEY:

Yeah, and I think that's fair. Again, as I reread this—and I guess I didn't even realize that came from the BC—it doesn't add to our recommendation. As you said, I think it's truthful. I think everybody understands that, but I don't think it adds to our recommendation. And again, maybe that sentence and the additional one—maybe that's just a footnote or I don't know how you would do it—but maybe it doesn't even exist. I don't know, but I think it's right. I think that doesn't add to this recommendation, and we could move that elsewhere or remove it completely.

STEINAR GRØTTERØD:

Hi, this is Steinar again. I just want to have it for the record that, first of all, I agree that this is overthought. Having the registered name holders be able to initiate the transfer dispute is within the scenarios where the

registered name holder doesn't have the support from their sponsoring registrar for the domain name. So that's for the record. I do understand that, and I also appreciate that most of the transfer disputes are handled without the transfer dispute policy because it's been handled in a good way between the corresponding registrars. I'd really like to keep it that way because that's something that's a good signal. And I think that we also have some stats saying that this is a very low number of disputes. Yes, and I sincerely hope that, over time, it will keep that low number. I don't think that our proposal should have to increase the volume and the work effort for the registrars, you know, whatever it is. I just want to have that for the record, that in the scenarios where the registered name holder doesn't have the support from the registrar, and they have actually locked all the process, they can't, they even don't have the data that may assist them in a court case or going to ICANN compliance, they are prevented from having that data. And that is also something that I would like to have in the record. Thank you.

ROGER CARNEY: Great, thanks for that, Steinar.

Rich, please go ahead.

RICH BROWN: Yeah, hi, Rich Brown for the record. Okay. I'm going to try to make this. How do I put it? The real issue here is, wow, way for my brain to just go dead. Can I give this over to Zak real quick? I'll be right back.

ZAK MUSCOVITCH:

what I wanted to mention is that yeah, in connection with Steinar's comments, I believe the stats were, in terms of how seldomly this is used, there was something like five or eight cases over its entire history or something. And it does fall into the category of be careful what you wish for, because if there were to be a new system that was registrant initiabile, that could abdicate any responsibility for registrars using what's been informally used successfully to date. But on the other hand, these are considerations and decisions that are beyond the scope of this working group, as we discussed extensively before, and that is, I believe, why, although I would like to see a straight out recommendation here in detail with the parameters, et cetera, the most that we, I think we're able to muster then, and I think the most that we can muster now is what's second best, which is to request the issues report, which I'm not crazy about because it's kicking the can and delays things and more work on staff accumulating what to a large extent people already know, but that seems to be the most that we can reasonably recommend in the circumstance, which would leave the door open to the kinds of considerations that Steinar and others have on this. Thank you.

RICH BROWN:

Thank you. So first of all, the group's current opinion is that the TDRP is the only official process for disputing a domain transfer. Like Steinar mentions, and he would like to keep it where the registrars deal with each other through the informal process—a term which has come up multiple times. We decided as a group that we're not going to be writing that process because the TDRP covers it. Then we identified as a group that the TDRP has two serious flaws: one, the TDRP can only be applied for by the registrar, so registrants are right out. They can

request the registrar to file one, but that's where their ability ends. Two, which was mentioned previously, the TDRP only covers where policy was broken in the transfer. It doesn't cover any sort of theft, etc., like compromised customer data used to steal a domain. So our suggestion here needs to be that we highly suggest that the TDRP is expanded to the registrant, along with the ability for compromised transfers and whatnot to also be looked at.

As far as this last sentence, "there remains a need for an intermediary mechanism," etc., I still agree that there is a need for such a mechanism, but it has been the opinion of the group that that mechanism already exists and it's the TDRP. So once again, I don't care if we leave that sentence in or out, but registrars are still left without an informal policy or anything to work with, which is technically why that sentence still exists, because it would be great. But I think the bottom line is either the TDRP has to be looked into, or if they're going to kick it back, something else has to be done, which we've already agreed is not something that needs to be done. So that's why we're having this discussion. Thanks.

ROGER CARNEY:

Great thanks for that, Rich. So before I go to Zak, I'm going to propose that we go ahead in the red box here, drop that last sentence into either a footnote or something and maybe staff can help us there. In this first sentence, the highlighted one under construction can go with it. I think, again, I think it's more informational than directive. So I think that those two things are more informational than directive. So I think that we can

move those out of the recommendations, and I think we would be good there, but I'll leave it to others to pine on.

So Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks, Roger. Zak Muscovitch. I think I could live with that solution. One possible permutation of it, though, is I think that the last sentence in making this recommendation that we recognize that this is a ton of work, blah, blah, blah, that that can just come out. I don't see the utility of even putting in a footnote. That goes without saying about anything the GNSO does, any changes that are made to create a new policy and balance priorities. So I think it's a given, doesn't even need to be said. It's implicit.

In terms of the highlighted line in the under construction box, if there were some way to integrate that with the I and Roman numeral I and Roman numeral II above, that would be ideal rather than push it into a footnote because I think that this is something, whether it's likely or not, this is something that needs to be looked at as part and parcel of a possibly expanded TDRP that covers more than what the TDRP currently covers. Thanks.

ROGER CARNEY:

Great. Thanks, Zak.

Theo, please go ahead.

THEO GEURTS:

Yeah, I have a question here when it comes to process, and I'm going to ask the question because I frankly don't know enough about this TDRP. I never dealt with it in my life, so I have no idea how this works. If we sort of expand the TDRP where the registrant can now officially initiate a TDRP, does that, and I sort of assume that's a formal process within the policy. But there's also an informal process. So what I'm a little bit worried about is if the registrant goes like, okay, domain name is stolen, I'm going to file a TDRP. With who is he going to file? With the registrar or immediately with the dispute resolution provider? How does that work?

And is it going to exclude the informal process, which is from what I've read on several Skype and Slack channels is when it occurs, it's usually highly effective? So I want to make sure that that informal process doesn't get overtaken by a registrant who is in what kind of state of mind and is insisting on the TDRP while the informal process would be a better one. So that's a little bit of my concerns there, and maybe I've got it all wrong. Thanks.

ROGER CARNEY:

Great. Thanks, Theo.

Zak, please go ahead.

ZAK MUSCOVITCH:

Thank you, Zak Muscovitch. So I think those are very good observations and points that Theo has made. But these are issues that we just can't address or let alone resolve here, right? So that's why we're doing the

whole ICANN punt to an issues report for this where those kinds of valid considerations can be more fully taken into account. Thank you.

ROGER CARNEY:

Great. Thanks, Zak.

Steinar, please go ahead.

STEINAR GRØTTERØD:

Hi, Steinar again. I'm actually going to look forward to the updated proposed text here because I'm not sure whether that is a yes, yes plus or maybe from At-Large side. But I'd really like to stress out that it is not over intention—that whatever we decide upon this recommendation, it should not be in conflict and should not stop any informal processes that the registrar has between themselves when there is a dispute. And that's so critical. I think this should not be the first option whatsoever. It should be the last resort option, so to speak. Thank you.

ROGER CARNEY:

Great. Thanks for that, Steinar. And maybe I'll make a proposal since Zak has started adding to this again. I think it's okay to drop the last sentence in the red box, because as everybody has said, I don't think it makes a big difference to what we're saying. We all know this. And I don't know if it makes people feel good that we recognize it, which may be a thing. But I think we can drop that.

As far as the first sentence in the yellow box, I think that that, to me, follows more as a rationale than it does a recommendation. So I don't know. And I'll leave it up to people to talk about.

So Zak, please go ahead.

ZAK MUSCOVITCH:

Yeah. I was just going to say that I hear what Steinar is saying. And I think that it's accurate that this draft recommendation, as it may be amended, is not intended to signal or convey to ICANN that any of us want to do away with the current and largely successful informal resolution process, nor do we want to eliminate the registrar's role in initiating a TDRP. And so maybe that's something that we could additionally include to put some better context in this so that a reader of this will understand that that is not our intention and that we want to maintain those things. Thank you.

ROGER CARNEY:

Great. Thanks for that, Zak.

Rich, please go ahead.

RICH BROWN:

First of all, you can't get rid of an informal process because it doesn't exist. That being said, the TDRP can only be filed by registrar. I'm just answering some questions that floated out there. Can only be filed by the losing registrar. And all fees associated with that must be paid by that registrar. Now we all know the real world, the registrar will only file

at the request of their registrant. Normally, if their registrant is willing to pay those fees.

But the third part is, as I stated earlier, the TDRP itself needs to be updated. No registrar is going to file, pay fees, and go through the whole process of a TDRP knowing they're going to lose because they already know that the transfer followed standard policy. So the TDRP needs to be fixed. Registrants need access so they can file. They need the ability to make payment.

And while I'm 100% with that, at the same time, we need to 100% support the update to allow for compromised domain hijackings, basically. So yeah, I just wanted to reiterate that.

And yes, only eight TDRP cases, only one of which are reversed. And that just shows you. Registrars don't want to do this. I believe last I looked at this, and this is probably 10 years ago, I was one of the registrars that were discussing filing one of those eight. And it was like \$1,500 to file. Let's be honest. You sit in that room and explain to your boss it's going to cost us, the company, \$1,500 to lose a case, see where that goes.

So yeah, I just wanted to open it up, clear the air, let everybody understand the processes that go on there. Also the informal process is not always highly effective. I deal with it daily. And while I have a high success rate in it, I really do. I still see about 25% of cases just die away. So anyway, thank you.

ROGER CARNEY:

Great, thanks for that, Rich.

Okay, I think we can move on from that. I think we've got some good edits here. And I think our comments helped us clean this up some. So I think that that's great. And one of the great reasons why we do public comments is to make these things better. But I think we've got a good point to move from here. And I think we can move to the next one, Caitlin.

CAITLIN TUBERGEN:

Thank you, Roger. So the next group of recommendations deals with the full portfolio transfers. So this is a new topic we've moved on from TEAC and TDRP.

So the first recommendation, recommendation 34, not all of the recommendations in this grouping received comments, but recommendation 34 received a few.

The first is about the title of the recommendation. Recommendation 34 is titled as fees associated with voluntary full portfolio transfers. But as we all know, there are, there is a mention of involuntary full portfolio transfers in part of 34.2. Excuse me. So there was some confusion here. And so the suggestion was either to remove the word voluntary and just note fees associated with full portfolio transfers or alternatively to title, to add involuntary and voluntary to the title. So those are two options, but essentially there was a few notes about it being confusing because it's not just about voluntary transfers.

Excuse me. And then the second comment that supported the change is in relation to 34.2. 34.2 talks about how the registry may choose to waive the fee associated with the full portfolio transfers. But in cases of an involuntary full portfolio transfer, for example, where a registrar is terminated by ICANN for noncompliance, the registry must waive that fee in that situation.

One of the commenters noted it would be helpful to break out that sentence separately so that it's very clear what the requirements are in the case of an involuntary transfer. So you'll see below in the yellow box what it would look like if the recommendation was broken up, we added a 34.3 to make that more visible to the reader.

ICANN org provided a lengthy comment here, not just in relation to the fee, but the set of recommendations involving both the charging of the fee, how the fee is calculated and how the fee is dispersed. We did have ICANN org, when we previously discussed the recommendations, we had one of our colleagues who is responsible for kind of the day-to-day operations and has seen many voluntary and involuntary transfers occur, talk a little bit about why some of the language is concerning. And I believe we have one of our colleagues attending the call who may want to speak to the comment because there was a couple of updates from the last time we discussed. So I'll pause just to see if someone would like to discuss ICANN's comments here.

MICHAEL SONG:

Hi, Caitlin. Yeah, this is Michael Song from ICANN org. So yeah, I'll be happy to speak about our concerns with these changes in the policy. So

I believe that the current policy, the intent and the spirit of the current policy with the \$50,000 one-time transfer fee was to compensate ROs for their time and energy, when that time and energy becomes significant. And in this case, that time and energy was determined to be over 50,000 domains transferred.

And I believe that the proposed changes are kind of getting away from that initial intent and spirit of the policy, because now we're compensating ROs for transferring 100 domains or even two domains. And I don't think that the policy was intended to kind of create a revenue stream for ROs, which is what I think this policy is kind of moving toward. I think the intent was just to compensate them for doing a significant amount of work.

So that's one comment I would say about the changes to policy. Another is that with the current policy, ICANN org is not involved in the billing process between ROs and registrars, because there will need to be. But with these changes that would kind of require ICANN not only to be involved, but to basically come up with a very elaborate complex process to kind of manage the whole billing between ROs and registrars. So I mean, that's another kind of, I guess, reason or disadvantage to the changes in the policy that I see.

One thing I would like to note is that for registrars, I do kind of see how the changes could be advantageous to them, because currently, with the current policy, any TLDs that have over 50,000 domains, the gain ratio, we need to pay a \$50,000 flat fee. So let's say there were three TLDs over 50,000 domains, that's \$150,000 in transfer fees for the bulk transfer.

So I know the new policy that kind of limits that to \$50,000 total, which I can definitely see is good for registrars, and some registrars would like to see. So if that's a concern for registrars, I do have a proposal which is to kind of keep the \$50,000 threshold, meaning only ROs or TLDs that transfer more than 50,000 domains can charge a fee. But then if registrars are concerned that that fee can become out of hand, one proposal I would like to make is that we can kind of limit that fee to \$50,000.

So for instance, let's say there are two TLDs with 50,000 domains, those two TLDs would now split that \$50,000 fee, so \$25,000 each. So basically, that would kind of limit the amount that the gain ratio would have to pay for any bulk transfer.

So those are my kind of two main comments. I feel the changes are kind of getting away from the intent and the spirit of the current policy. And I also feel like the changes will kind of require ICANN to be involved in the process that I don't think we really should or need to be involved in.

And also, just to kind of address maybe the advantage to registrars that the fee will be limited, I also have a proposal to kind of maybe kind of limit that fee to \$50,000 total among ROs that are transferring over 50,000 domains. So, yeah. Thank you. Those are my thoughts and comments on these proposed changes.

ROGER CARNEY:

Great. Thanks for that, Michael. Caitlin, did you have anything else on this one?

CAITLIN TUBERGEN: I don't think so. You'll just note that in the yellow box where the text is under construction, we have the acknowledgement of the voluntary involuntary or removing it entirely. And then in 34.3, we added the language about separating out when the fee must be waived to make that more clear.

ROGER CARNEY: Okay. Great. Thanks, Caitlin. And I think just crossing out any voluntary or involuntary makes sense, just removing it. Fees associated with full portfolio transfers, I think is a good title. And I think that that resolves the comments on that list. And splitting up 34.2 into two, perfect sense to me, it's clear. And I think that's a good addition.

So unless people have any specific things on that. Rick, please go ahead.

RICK WILHELM: I agree with your points there, Roger, that you were making about splitting those things up. The way that the, and just to respond to the comment I made in the chat, my point about the, when I said, isn't it already limited, I was talking about the current recommendation as written. Michael is correct that the policy as written right now does state that every TLD that transfers over 50,000 domains may charge 50,000 with the current policy. And the way it's rewritten has a total fee of 50,000 that is then apportioned.

So yeah, but I think that Michael and I are now on the same page.

ROGER CARNEY: Okay, great, great. Yeah, and thanks for that, Michael, because you did, I don't remember us discussing that proposal that if multiple TLDs are involved and those with less than 50 can't charge a fee, but those greater than 50 could split the 50. I don't think we ever discussed that option. And I hope I said that right, Michael. So correct me if I'm wrong.

MICHAEL SONG: Yes, it is. Thank you. Yes.

ROGER CARNEY: I think that that's worth discussing. I don't think that's a huge change to what we've said. Maybe it cleans up a little bit and helps the math a little easier because, again, if someone has 4,000, that TLD wouldn't be able to charge for it. In today's policy, they wouldn't be able to charge for it. So maybe that goes along with that. Again, I think Michael hit on a lot of the reasons here. But one of the big reasons we were adjusting this was whenever this was done many years ago, there weren't 1,200 TLDs. So there's a different scale mechanism we have to try to fit in here. And again, that explodes that possibility that a registrar may end up paying a lot. But Michael had the solution to that.

So I'll open up the floor because I think we never did talk about that. So I think that's a new proposal here. And again, I don't know if that's good or bad. It seems to make sense. It seems to make the math a little easier that anyone with less than 50,000 can't charge a fee and everyone over 50,000 gets to split the 50,000 dollar fee. So I'll throw it onto the floor

and see what people think. And if there's no thoughts, we can obviously table it so everybody can think about it.

Okay, I think let's go ahead and make these changes as identified here, Caitlin. And let's everybody stew on what Michael proposed is, again, if a TLD has less than 50,000 on one of these moves, they can't charge a fee. And those with more than 50,000 have to share the 50,000. So think about it and we'll hit back on it. I don't want to spend too much time for everybody to think. So here, but we'll talk about it next week.

So okay, Caitlin, I think we can move to the next one.

CAITLIN TUBERGEN:

Thanks, Roger. So for recommendation 35, this is the recommendation regarding retainment of the current full portfolio transfer fee ceiling and minimum domain name threshold. So this is about the 50,000 dollar fee.

So the first set of commenters oppose the 50,000 dollar fee, noting that this is an arbitrary fee, also noting that it's essentially a large fee for updating databases and accordingly the fee is not warranted.

There was another comment about recommending that the working group consider mandatory reasonable transfer timeframes, milestones, and or safeguards to protect registered name holders seeking portfolio transfers against intentionally obstreperous tactics by registrars.

So in looking at the language here, we just added the comments but weren't entirely sure how to incorporate those comments. The first comment commenters were obviously just opposed to the

recommendation entirely. And then the second comment is about adding additional requirements for to protect registered name holders.

So I will see if anybody has anything to add to those comments that I may have missed or any reactions to changes for recommendation 35, if there are any.

ROGER CARNEY:

Great. Thanks, Caitlin. Yeah, and we did have some pretty good discussion on this 50,000 dollar fee and we got to a spot where we said reasonable or whatever and then we got to a spot where reasonable didn't seem like that was possible because reasonable to someone is different across the board so you could have different fees depending on the registry operator. So I think that that's why we went back to just maintaining the current status quo.

And as far as putting the timeframes on it, I think we ran into the same problem as the complexity is different for every transfer, so timelines become a little, I suppose, unpredictable. Obviously we still want registrant protections and I believe we do still have a recommendation about that, that it has to be notified in advance, 30 days or 60, I can't remember what it is, but I think there is one of those. So I think we're okay. Again, we discussed the 50,000 and we had multiple sessions where we talked about it and talked about it, so I don't think we have to talk about that. Again, I think the status quo is what it is. And the timeframe, again, we have talked about and I don't think we can put a timeframe, timeline, whatever someone wants to call it around these because they're just too unique. So unless anybody objects, I think we

leave it as is and we call it good. Okay, I think we can move on to the next one, Caitlin.

CAITLIN TUBERGEN:

Thank you, Roger. So the next recommendation that received comments was recommendation 40. And recommendation 40 is about the inclusion of BTAPPA into the transfer policy.

There was one comment here which seemed fairly straightforward and that is essentially about the footnote included in recommendation 40. The commenter notes here that if this is supposed to have, be authoritative, the footnote should be placed into the main language of the recommendation to make it clear that this is what the working group is recommending.

So in the yellow box, you'll see that we've taken footnote 18, I believe, if my eyes are, that small number is now relocated into the text rather than as a footnote. I believe there was a suggestion in relation to other footnotes that if this is a concern throughout all of the recommendations, the working group could recommend that all footnote text is to be normative and consider part of the policy recommendation, but alternatively, the working group could consider including footnotes into the recommendations themselves.

So that was the only comment on this recommendation. So we'll see if anyone has any reactions to this comment or including the footnote into the recommendation text.

ROGER CARNEY: Great. Thanks, Caitlin. Yeah, and as far as marking all footnotes as normative, I think that gets a little tricky because then when you do want a footnote that's not, then it becomes an issue. I think if we look at them individually and say that it should be or shouldn't be, makes the most sense. But for this one, I don't see a problem with including the text in the recommendation. Rick, please go ahead.

RICK WILHELM: I think for this one, just go ahead and put it into, for the avoidance of doubt, put the footnote in that says for the avoidance of doubt. It's a recommendation, so it's not policy language itself. So let's just move the footnote into the, just move it up and simplify it. Thank you.

ROGER CARNEY: Great. Okay, I think we're good here, Caitlin, and we can move on.

CAITLIN TUBERGEN: Moving on to recommendation 41, we received two comments on this recommendation. The first comment is that it's supported, the commenter is supportive of expanding the transfer policy to include BTAPPA. However, they recommend that the working group make clear that the qualifying circumstances required for BTAPPA should remain required in the transfer policy, and also the working group should further consider adding the option for the current losing registrar to consent to the BTAPPA in cases where the qualifying circumstances are not met.

And then the second comment was a comment from ICANN Org, specifically in reference to the text around agent of the registrar, because there is such as a reseller or service provider. But ICANN Org is noting that reseller is a known term, but service provider is not a well known term. So could there be some explanatory text about what this is meant to be? Is it meant to be something other than a reseller? And if so, could that be specified?

I believe those are the only comments for this recommendation. So I will hand it back over to you, Roger, to see if there's any thoughts on these comments.

ROGER CARNEY:

Great. Thanks, Caitlin. And just to add real quick, one of our recommendations, or maybe it just was part of BTAPPA, is that we're going to maintain the fact that the registry gets to deny these. So I think that BTAPPAs aren't always going to get executed if there's something wrong with them. So I think that that probably handles the first comment, but I don't know. I'll leave that as discussion.

And as far as agent of the registrar, the only thing I can think of is, sometimes, hosting, web developers have multiple domains of their customers registered to themselves or some along that line, and maybe they want to move them. So it's not a reseller specifically. So I don't know. I think it's bigger than reseller. Rick, please go ahead.

RICK WILHELM:

Thank you, Roger. So first, I think that in on the first comment, I think that consent of the losing registrar is one of the qualifying circumstances. So I think that it's sort of self-evident there on the first one.

For the second one, I think that the fact is that if there's wording here, maybe the issue here is not an agent of the registrar. Maybe the issue is that we needed to remove the word and agent of the registrar, but there's some other relationship of the entity to the registrar. You know, they don't necessarily have to be an agent of the registrar because, you know, this might end up being some sort of a customer, any customer of the registrar that wants to move its portfolio if, you know, depending on, you know, there's some customers, I'm sure that the registrars within earshot where you've got individual customers that are bigger than many resellers.

So maybe we should just, we need to zero in on that notion of agent because this thing here where ICANN legal is picking on this thing, it really, to me, when I think about this, the BTAPPA thing that the vision that I'm thinking of is that if the gaining registrar and a losing registrar show up with a signed agreement to do a BTAPPA and everybody's in agreement on it and it meets the circumstances and the registry, the gaining and losing registrar all agree and they handshake on it, let her rip. Yeah. Hopefully that helps. Thank you.

ROGER CARNEY:

Yep. Thanks Rick for that. And I think that does help. And maybe it is as simple as the word that you used, just change that to where a customer

of the registrar elects to transfer its portfolio and maybe we can remove agent and reseller and service, all that. Because a reseller is a customer of the registrar itself. So thoughts, concerns, anyone? Okay, I think we can just do that and that solves that.

CAITLIN TUBERGEN:

Thank you, Roger. We have one more recommendation that received comments and that is recommendation 46. Recommendation 46 is about the notice of registry fees for a BTAPPA. The recommendation text notes that registry operators may charge a fee, but they must provide notice to registrars of any fees associated with this type of change prior to the initiation of the transfer. But ultimately registry operators have flexibility to determine how to provide the notice.

So there were two comments on this recommendation. The first comment is about concerns regarding the potential costs associated with this expansion. For example, if registries could set high prices, this could undermine the recommendations effectiveness and intended benefits. So it's crucial to ensure that the costs associated with BTAPPAs do not preclude a healthy and competitive market.

And then the next comment is instead of leaving it open on how the notice of fees is transmitted to registrars, could there be a standard way to provide this? Registrars have previously raised the issue of talking to multiple registries and having different processes can present challenges.

So those were the two comments here. I will toss it back over to Roger to see if anybody has any comments or proposed updates to the recommendation language based on these comments.

ROGER CARNEY: Great. Thanks, Caitlin. Rick, please go ahead.

RICK WILHELM: Sure. For the first one, us at this policy group, getting into the business of setting prices is worthy of a chuckle, to quote the chair. And we just can't go there, for obvious reasons.

The second one, this group getting into the detail of how the registries are going to communicate the notice of fees for BTAPPA is a minutia that we really don't need to get into because it doesn't involve the consumers and we don't need to have the policy be setting the ways in which the registries communicate with the customers. It's just way too detailed. So we don't need to dig into that. Thank you.

ROGER CARNEY: Great. Thanks for that, Rick. I think Rick's right on both of those. I don't think, and I think we did discuss multiple ways that registries could provide this and we decided to make it flexible and leave it that way. So I think we had that discussion and we made the decision to be flexible. And yes, I think we had the discussion on charge of fee and we avoided that as well on purpose. So I think we are good on those comments.

Caitlin, did we skip recommendation 42?

CAITLIN TUBERGEN: I'm sorry. I got ahead of myself on that. Thankfully recommendation 42 has some pretty straightforward comments. So recommendation 42 is about the required register notification of the BTAPPA.

We had a comment similar to a previous comment on a BTAPPA recommendation about footnotes being included into the main recommendation text instead of, if the working group would like those to be authoritative policy text. And then there was also a comment on 42 about that the recommending that the policy stipulate that regardless of the means used to notify registrants, notifications must be properly documented, retained and made available to compliance.

So those were the two comments. You'll see in the yellow box there is an addition of numbers to break up the text and to include those footnotes into the main policy recommendation text. So we can see what the working group thinks about that addition as well as I'll include this in the chat for the group to consider if it should belong in the recommendation. This is the recommended text about documenting the notifications and what the group thinks about that. So I'll turn it back over to you, Roger. Thank you.

ROGER CARNEY: Great. Thanks, Caitlin. And again, I think if we look at individually, the footnotes, does it make sense for these to be part of the recommendation? I'll leave that up. I don't have a problem putting them in the recommendation and what Caitlin put in chat I think would be a good 42.4 as well. I think that makes sense if everyone agrees to include

these footnotes in. So I think if everyone is good with under construction, I think we can, and Caitlin's chat as well as a 42.4 probably, I think we would be good with this. And I'll leave it open to anyone that wants to discuss it. Okay, I think let's go ahead with the under construction here with your note, Caitlin, as well. And I think we can see how everybody can digest that. And then next, Caitlin.

CAITLIN TUBERGEN:

Thanks, Roger. So we have seven minutes left, so I have a suggestion for the group's consideration. I think we have time to go through the first question posed, open question to the public commenters, which is about any recommendations not considered that commenters were allowed or given an opportunity to write in to see if the working group thought there was something that the group didn't consider.

There was a second question was about the updated format of the report, but that was more about format rather than the substance of the recommendations. The third question was other comments, and that was the free form response. There were a lot of other comments provided. We're not going to have time to get through all of those today. So what I would suggest is I'll quickly go through the recommendations not considered and see if there's any reactions to that. And what we would ask is for the second and third question, the updated format and the other comments, if working group members could go through those and note if there's any that they believe the working group needs to discuss. And of course, we're looking at things that the working group hasn't already discussed.

So I would say the majority of the other comments are reiterations of things we've already discussed as we've gone along the public comments through all of the recommendations. But just to make sure everything is fairly, transparently and appropriately considered. If you do think there's something we need to discuss, if you could flag those by Monday for the question two and question three.

And then the other thing we would ask if everyone agrees, particularly Roger, is we'd like you, now that we've gone through the comments on all of the recommendations, we would like the working group members to flag the recommendations that need more working group discussion during call time. Some of the things can be worked on asynchronously in writing in the Google Docs, if you have additional comments. But if you think more verbal discussion is needed, we'd like you to let us know what those are so that we can build out the agenda.

Some of the things there have been more concerns provided and additional discussion may be needed, but we would like to know from the working group what you all think those are. And if you have some concerns or questions about that assignment, we'll put it in writing after the meeting, but please let us know.

But I'll just quickly go through, there were two comments received for the recommendations not considered under Q1. The first was from ALAC, and the comment is, while it is believed that no special provisions need to be made in this policy at this time for IDN variant transfers, please consult the IDN EPDP for further information. You all may remember that the IDN EPDP phase two team wrote to the transfers group, shared the recommendations, and we provided a draft response

to share with this working group as well as with the IDN variant team. And the conclusion of that was essentially that no changes in the transfer policy were needed at this time, and that the implementation of those recommendations wouldn't interfere with the transfer policy recommendations. In other words, the transfer policy recommendations do not pose a conflict to the IDN variant recommendations. But we are in communication with those colleagues, and if issues arise that need input from this group, we will be sure to flag that. I don't know if there's any questions or comments on that particular question before I go to the next one.

Okay, I'm not seeing any hands raised. So there was a lengthy comment from Leap of Faith. I think the summary of the comment is, you know, there was a very lengthy comment provided to the group's phase 1A initial report, and this commenter felt like many of those comments were ignored in the working group's first consideration of the comments to phase 1A. The updated initial report, or the group second report, but the one that includes all of the groups of questions, notes that the previous public comments were considered and this commenter doesn't think that is an accurate assessment.

What we've done with this round of comments to try to make it more transparent to commenters that when you go to the recommendation, you'll see that there is a column for the working group's consideration or reaction to the comment, working group discussion and notes, and then the ultimate working group response. You'll see that in many instances, support staff has captured working group discussion and notes as we've been going along with the other recommendations. In many cases, the working group response has not been added yet

because the working group is still working through making any final changes to the recommendations.

But I did just want to note that I think we take that feedback seriously. We don't want any commenter to feel like we're not, the working group hasn't reviewed their comments and considered them, and so now there is an actual paper trail, for lack of a better word, or documentation of here's your comment, here's the working group's response to that, and here's where the working group ultimately landed in terms of if they updated their recommendation based on this or not.

This commenter went through and provided specific examples of either comments that he believed were ignored or just superficially addressed. And so I recommend if there's any additional things the working group thinks we can do to ensure that comments are addressed and considered, please let us know. And if you think there's a way to make it more clear, we're certainly open to that.

I think there was a concern from this commenter that there was a capture of the working group and that registrar interest may be considered over others. So I think that's something to keep in mind as we go through the comments.

But I see that it's now 11:30, so Roger, I don't know if you have any further comments before we close the call, but I will stop speaking now.

ROGER CARNEY:

Great. Thanks, Caitlin. No, I didn't have anything further. Just that thanks to everyone. Again, this was a lot of work to get through, and we

made it through the majority of this and we still have one more session to get through the rest of it in any further discussion. And again, it's not the last time everybody's going to see all these recommendations because now we get to put them all in final report form and everything. So I think we're nearing the end, but we're not there yet. So I just want to thank everybody for their time spent on this and we'll talk to everyone next week. Thanks, everybody.