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JULIE BISLAND:

Good morning, good afternoon, good evening, everyone. Welcome to the Transfer Policy Review PDP Working Group call, taking place on Tuesday, the 22nd of October, 2024. For today's call, we have apologies from Jim Galvin, RySG, and Jody Kolker, RrSG. Jody formerly assigned Christopher Patterson, RrSG, as his alternate for today's 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. And seeing no hands, 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. Please note all chat sessions are being archived. 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. I don't have much to share here. I just want to say thank you to everyone for last week's very productive meeting. We got through a lot of the stuff that we needed to do, so it was great. Hopefully we can keep that momentum going here. We have a little more to cover here just because we're going to give updates on what the old recommendations that we looked at, what they look like now, and then we'll jump into the homework

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*Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.*

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recommendations. But hopefully we continue great progress as we did last week, but I think I will go ahead and turn this over to Caitlin to walk us through the updates that we made to some of the recommendations from last week. Okay. Please go ahead.

CAITLIN TUBERGEN:

Thank you very much, Roger. This is Caitlin Tubergen from ICANN.org, for the record. If we could go to the public comment review tool, I did want to make note, some of you that have been reviewing the tool closely may have noticed that support staff has gone through and added information to the working group response column. So you'll see after the comments, there's a column where we can take notes on the working group's discussion, and support staff has gone through to assist the working group with an attempt to capture what the working group agreed to on the call. Because this is a Google Sheet, all working group members have the ability to comment and note if you think that either the conversation or agreements weren't captured correctly, or alternatively if something needs to be added, or any sort of edits that you think are appropriate. As a reminder, this is the tool that's going to be published, or rather is published on the working group site, and where public commenters can go and see in detail how their comments were treated or how the working group responded to those. So in order for transparency, as well as out of respect to the folks that took time to submit comments, we're going through and showing exactly how the working group responded. As you'll see in the working group response column, as the working group is working through the text of the updated recommendations, those columns will be filled in at that time. But we would like to draw your attention to the working group

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discussion notes column, where we've attempted to capture the discussions from last week, for example, on the recommendations that we have covered. And if you disagree, again, please go in and comment, or if you think anything else needs to be added, please feel free to go in and comment on those, because this is very important. We're not going to spend the working group meeting time going over those summaries. They are captured in the notes that are distributed after the meeting, and obviously they're captured within this document. So anyone who's interested, please feel free to read those.

As Roger noted, the next part of the agenda is to go through the recommendations that we discussed last week, particularly the recommendations where updated text was proposed from public commenters. So if you weren't in attendance last week, this document, the Public Comment Review Recommendation Drafting Guide, is a tool that we're using that's linked within that public comment review tool, where the working group can work through edited text for each recommendation. So you'll see three boxes for each recommendation. The first box is the green box. Thank you, Christian, for pulling that up. Sorry, the first box is the red box. That shows the exact language from the initial report. You'll see that it's annotated with some comments, and that represents comments received from the public commenters. These are summarized. They're not verbatim most of the time. We expect that every working group member has already read through all those comments, so we're just keeping short summaries to remind the group where there were issues from public commenters with that particular recommendation. And the yellow box, which is underneath the red box, this is the, quote, under construction recommendation. And

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I gave this disclaimer last week. I'll give a similar disclaimer this week, which is the working group hasn't agreed to this language. This is merely a visual representation of comments that public commenters submitted where we actually add the requested language into the recommendation so that the working group can see what that would look like and have a discussion from there. The green box at the bottom will be where the agreed to final report language is included. And that also gives a trail for the community to look and see this is where the recommendation started in the initial report. These are some of the changes the group considered, and this is ultimately what they agreed upon for the final report. And that language will be included back in the public comment review tool as well. But for purposes of review within the working group, Google Sheets can get a little bit unwieldy for reviewing text, and this group in particular has a lot of experience with editing Google Docs. So that's how we are proposing to go forward. But as support staff has shared in the past, if there are issues or suggestions for how to better go about this review, we are open to those. So we'll continue in this method unless we hear that there are problems.

And after that very lengthy monologue, the next part of the agenda is to go back and review those recommendations from the first block where there were comments submitted and accordingly text has been adjusted slightly or significantly depending on the recommendation. So the first one of those recommendations is Recommendation 5. So Christian, if we could go to Recommendation 5 in this document. This is for the definition of the Transfer Authorization Code. A couple working group members put in comments into the under construction definition. As a reminder, the concern in the initial report language that commenters

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called out is that the definition uses the language authorizes the transfer when this code is presented. And several commenters noted that even if the TAC is obtained, the transfer might not be able to go through for a variety of reasons. And those are included in the transfer policy. But just because a registrant is able to get the Transfer Authorization Code or it's presented to the registry, it doesn't necessarily mean the transfer will go through. And accordingly, the commenters noted there were a couple of ways to adjust the text. But the suggestion here that you'll see in the second sentence is to adjust the language slightly to the TAC is required to be presented for a domain name, dot, dot, dot, and when presented authorizes an eligible transfer using the term eligible. In the language provided that's been crossed out, a couple of working group members noted that that language made it a little bit more confusing. We did include some of the details that the public commenters provided. So for example, if the name is subject to a pending UDRP proceeding, that domain name is required to be locked until that proceeding, until the UDRP provider notifies the registrar of the outcome of that proceeding. So the working group might want to include some examples of what that means, or what an eligible transfer means. But if the group thinks that is self-explanatory, then we can leave the language as is. But I will turn it over to Roger to see if the language here, again, the second sentence that bracketed to be presented and the addition of an eligible before transfer is something the working group thinks would be an acceptable change to this recommendation.

ROGER CARNEY:

Great, thanks Caitlin. Yeah, and I think as we talked last week, we got into how to define this. So I think Caitlin showed this. It's the eligible

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transfer. I like the language of that because it allows new reasons for eligibility to come in. It's hard to list the eligible. One thing I can think of is maybe providing an example, but not an exhaustive list. That's the only thing I can think of. And maybe that's just a footnote or something. I don't know. But the open part is, I think, does this make sense? And is it better than the authorize, just authorize the transfer? I think it satisfies the comments that we received and does make it clear. The bolded text and the parenthesized text of to present it is interesting. I don't know. You know, when I read it, I don't know that it helps me or doesn't help that text either way. So, but I'll open it up to any anyone that wants to comment on these changes. I mean, at some point, Ken's comment in chat about 22 and 23 being eligible. I think that covers a lot of them. And again, I like the openness here because we don't know if a new policy will be written next year that adds a condition to that. So. Okay. Any comments, questions, concerns about this updated language? Okay. I think that's pretty good language. And I think we can move forward with that. Again, I think it addresses the main concern out of the public comments. And I think it helps clarify it. So, thanks, Rick. I think we can move on to the next one, Caitlin.

CAITLIN TUBERGEN:

Thank you, Roger. So, we can move on to recommendation six. The concerns with this language were pretty straightforward. The first is the title of the recommendation is called the Service Level Agreement for TAC Provision. There were several commenters that noted that that's not a precise term, and it should be adjusted to require timing for TAC provision, which is also more user-friendly in terms of the language. Some people might not know what service level agreement means. And

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then the other comment that we received, and this was across the board on all recommendations, is that whenever there is a reference to calendar days, is that whenever there is a reference to calendar days and hours, the commenter noted that hours should be preferred and used exclusively instead of calendar days because it's more precise. The commenter noted that days could be rounded up or down, and so it might not be consistent across all registrars, while hours should be. So, the changes here in the yellow box are simply changing the title from service level agreement to required timing and removing references to calendar days in favor of just hours. So, with that, I'll turn it back over to Roger to see if anyone has any questions on those changes. Great.

ROGER CARNEY:

Thanks, Caitlin. Yeah, and again, I think this was fairly easy to go through and update. As Caitlin said, I think we'll see the hours thing come up multiple times, but I think everybody sounded like they were in agreement with that last week as well to update that. But any comments, questions on this update to required timing? Okay, great. I think we've got a good update here and it addresses the comments. So, I will turn it back to Caitlin for our next one.

CAITLIN TUBERGEN:

Thank you, Roger. Our next is Recommendation 7, which I will admit is the simplest of all of the recommendations. One of our registrar friends noticed that there was a missing comma. So you can see after modifications there's been a comma added. I think those are folks who are in favor of the Oxford comma and just wanted to see if there were

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any objections to adding this requested comma from a public commenter before moving on.

ROGER CARNEY:

Great. Thanks, Caitlin. I think we're good. And we can go on to the next one if there's no one. Okay, let's go ahead and go on to the next one.

CAITLIN TUBERGEN:

So, we have two more. The next is Recommendation 9. So, this recommendation is about the TTL. The first suggestion, and this goes back to what we just discussed, is to remove any reference to calendar days in favor of hours for the sake of precision. The second was there was a concern about the TTL not being long enough in certain instances. The Working Group did discuss this last week. So, the bracketed language notes that the registry could waive that TTL if they receive instruction from the registrar. Last week, the Working Group did not seem to be in favor of that addition, noting that in the event there is a situation where a transfer could take longer than 14 days because there's multiple layers of attorneys or agents in the middle, that the agent requesting that transfer should only initiate the transfer when they're ready. And so, they should get all the required approvals ahead of time rather than making the TTL longer. And then, the second piece was that registrar commenters noted that the language of Recommendation 9 provides that the registrar may reset the TAC under agreement by the registrar of record and the registered nameholder. However, some registrars noted that there are emergency situations where the TAC needs to be reset without the explicit agreement of the



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registered name holder when there's a situation where it would be in the best interest of the RNH to reset that. And that's an obvious security breach, account compromise, or some sort of fraud. So, the language in 9.2, the suggested language, that was provided by a couple of commenters that were registrars. So, I think that sums up the changes here. And I'll turn it back over to Roger to discuss whether these changes are agreed to by the group or if there's any concerns with these. Thank you.

ROGER CARNEY:

Great. Thanks, Caitlin. Yeah, and I won't touch on the hours thing. We'll just skip over those when we hit them unless someone has a specific comment on them. But yeah, I think Caitlin was right. I think for 9.1 last week, we talked and we didn't see the need for this additional language here. There are ways for extending a TAC. You can get a new TAC easy enough and things like that. So, I think that the group is recommending not changing 9.1 except for the hours. And in 9.2, I think that this made sense to everyone, but I'll open it up for sure to get comments on it as well. Obviously, we know there are emergency times that it could be needed. So, I'll just throw that out there. Rick, please go ahead.

RICK WILHELM:

Thanks, Roger. Very much in agreement with the suggested edit to 9.2. And thanks to whoever saw this gap because upon looking at that text sitting there, that seems like a miss from previously. And so, I think that's a very good upgrade and certainly agreed with the current position on not taking the edit to 9.1. Thank you.

JEFF REGAN: Great. Thanks, Rick.

KEN HERMAN: Thanks, Roger. Isn't resetting the TAC to null a form of transfer denial? It sounds to me like the registrar will basically deny the transfer in the form, in this case, of resetting the TAC to null because they think there's some risk involved. And shouldn't something like that be included in one of the recommendations? I don't remember what I said earlier, 21 and 22, as a reason for denying a transfer that there's evidence of some malfeasance.

ROGER CARNEY: Great, thanks Ken. Yeah, and I think, I think you're right, I think that makes sense. And I think it is time, and I don't remember either Ken what you want exactly, it's one of those 2234 whatever it is. I think it ties to that and then with that, that ties back to this so I think that you're right this is a sort of denial. And it should be based on one of those. So I don't know if we need extra language that says that, or if that just ties it together. Rick, please go ahead.

RICK WILHELM: All right, thanks Roger. I don't know that it that I would necessarily call it a denial because the registered name holder certainly has a chance to come get another TAC. It's a situation, a registrar might invalidate the TAC, just because they think there's an operational problem at that instant with this particular transfer attempt. So, which is different than

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saying, we're not going to let you transfer this name. It's just sort of like, we think there's a problem going on right now with this particular transfer attempt. And so that's why I put in the, in the chat. It's not necessarily a denial but more like pumping the brakes on what we're doing right now with this particular transfer. So it might be a different situation than saying, no, we're not going to let you transfer this name full stop. Thank you.

ROGER CARNEY: Great, thanks for that. Theo, please go ahead.

THEO GEURTS: Yeah, thanks. And I agree with Rick. This is about resetting the TAC under certain conditions and not talking about a denial of the transfer, which is covered elsewhere else in the policy. So, while I appreciate the concern from Ken, but I think we sort of nailed this one. Very happy with the current text. I mean, if there is an emergency and we need to do it and it is in the best interest of the RNH, then we are allowed to do it. And we only going to do, going to use this one, if there is a real need for it, because we need to prevent some kind of harm, security breach, it's already in there. Thanks.

ROGER CARNEY: Great. Thanks, Theo.

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KEN HERMAN:

Yeah, thanks. Thanks, Rick and Theo. That's understandable. I can see that there's a need for a reaction. I'm just looking at this from the RNH's perspective. I mean, if I go ahead and request the transfer and for some reason the transfer simply is not happening, I'm not going to know that the TAC has been set to null. All I know is that my transfer has been denied or delayed in some case. What I'm interested in here is some requirement or something that says that the registrar is obliged to explain the situation. All I know is that nothing has happened and there's no obligation. Yes, many registrars possibly will come back and explain the situation to me in some way when I call them, because all I see is that nothing has happened. So I'd like to know from the registrar community, it's like, well, when this happens, what are you going to do? And how can we be sure that all the registrars sort of follow a standard procedure? Okay. We see something that is amiss with the account, with the systems, etc. We cannot proceed with this at this time. So how can we communicate that to the RNH instead of just leaving them stranded and wondering what is happening? That's my concern. I hope that's clear. Thanks.

ROGER CARNEY:

Great. Thanks, Ken.

THEO GEURTS:

Yeah, so Ken, and this is Theo for the record. So that concern that you have, I cannot take it away completely. I mean, speaking as a registrar and we have dealt with resellers who refuse to transfer a domain name out. They wouldn't give the authorization code. They were stalling the

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transfer or denying the transfer or whatever they're trying to do to prevent their customer from moving away from the reseller. You know, that is something you cannot completely avoid. But that being said, we've dealt with this. We find it as a registrar, very annoying when a registrant notifies us of such a situation. And it gets even more annoying when a registrant goes to ICANN compliance, because now I got an issue. Now I've got to do a full explanation on what happened, you know, and basically, you know, as a wholesale registrar, you know, what do we make on a renewal of a domain name? 15 cents. How much money is going to cost me to explain to ICANN compliance why our reseller is unruly and why they've done what they've done? Explaining that, that's 300 euros worth of a ticket. I mean, any ticket that we get from ICANN compliance regarding a transfer that has been denied on the wrong reasons by a reseller, that's a massive loss for us. So we always make sure, at least we try to, to make sure that the registrants are best served as they can. But, you know, again, you cannot completely avoid it. But there is, of course, a recourse, and that is ICANN compliance. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. And as I sit here and try to think through what Ken was saying, is it as simple as, you know, adding into this number two here that without the agreement, they can set it to null and they notify the registrant that they set it to null. Is it that simple just to add in and notify RNH here? Just thinking out as we go through it. Thoughts? Does that resolve Ken's issue here of nulling it and not, again, as he said, the most likely scenario would be that we would be able to set it to null. Nulling it and not, again, as he said, the most likely scenario would be

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the registrant just calls in and then they find out. Any objection to adding a simple language that says and notification to the registrant? Okay. Theo, please go ahead.

THEO GEURTS:

So it's not a strong objection. It's just a perspective, I guess. You know, sending a notification can be useful. But again, if we are talking about a security breach or there is some other major event going on, we might not have the time or the information to send a notification with useful information to the registrant. That could be the case there. So, if you sort of now put in that requirement of the notification, that can put a registrar in a bad spot because they might not be able to send a notification for a variety of reasons. Maybe even that we are not able to think of right now on the spot. Thanks.

ROGER CARNEY:

Thanks, Theo. Okay, let's toy with that. And again, we don't have to resolve it here. Let's think about that and think about if, you know, adding language of subsequent notification into this bullet too, if that makes sense. And we can move on from here. Caitlin, I think you can take us into the next, maybe last one.

CAITLIN TUBERGEN:

Yes. Thank you, Roger. The last recommendation is recommendation 11. This is the recommendation about the notification of TAC issuance. As a reminder, a couple of the concerns here were related to the fact that the notification of TAC issuance is sent no later than 10 minutes after the

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registrar of record issues the TAC. However, that might not give enough time in the event that the TAC is issued to a fraudulent party or someone other than the RNH to stop the transfer from happening. The second comment here was that a small suggestion that any time there's a reference to the notification must be provided in English and in the language of the registration agreement. A request to add a parenthetical if different after registration agreement so that it's clear that if the registration agreement is in English, only one notification needs to be provided here. Also, there was, in reference to one of the footnotes about how the notification could be sent, there was a comment from ICANN.org about one of the RFCs, I believe it's 9154, about how secure communications should not be sent via email because there is a security issue there. So that was a comment received there. There was also a comment received about who should receive that notification, and in cases where a privacy or proxy service provider is used, this commenter is recommending that both the registered name holder as well as the underlying customer should both be notified just in case there's some lag time in the underlying customer receiving notices, that both of these entities get the notice instantaneously. And then lastly, I believe there was a comment about, or a comment requesting that when a notification of TAC issuance is sent, the registrar should be required to ensure or get confirmation that the registered name holder meant to request the TAC for another layer of security.

So with those comments in mind, there have been a couple suggested changes to the recommendation. The first is at the top. This is in relation to the privacy proxy comment. The group talked about this last week. We noted to add underlying customer if the RNH is utilizing an affiliated

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privacy or proxy service provider. Last week, the word affiliated wasn't included. That was included as a potential option. There was a concern from working group members that in many cases, particularly when there's an unaffiliated privacy or proxy service provider, the registrar isn't going to know that the registered name holder is a privacy or proxy service provider. We added the word affiliated just in case that would help address the concern of the commenter, but we invite working group members to respond to that. The second change, as you'll see, is the inclusion of the parenthetical, if different, related to the language of the notifications. And then last, the 11.3 addition, this was added in relation to the concerns about allowing the registrant to have more time to invalidate the TAC. The request was for a period of 24 hours. If I remember correctly, the working group discussed this last week and said actually the registered name holder would have up to 14 days to invalidate the TAC. So this language wouldn't be necessary and instead it would just be clarifying in the working group's response to the commenters that there would be 14 days to invalidate the TAC once it's sent, since there was some confusion there from the commenters. We didn't include language about asking the registrant to confirm that it did request the TAC. That's something that the group could consider including in the notification of TAC issuance. For example, including a bullet about an affirmative acknowledgement is required. But the interesting part here, of course, is that at this point the TAC has already gone out and the registered name holder would have the ability to invalidate or write to its registrar to question or challenge the provision of that. So with that, I think that's an overview of some of the changes we talked about, and I'll turn it over to Roger to see what the working group thinks of these changes.



ROGER CARNEY: Great. Thanks, Caitlin. And I don't have to say anything because Theo is ready to talk. Go ahead, Theo.

THEO GEURTS: Yes. So on 11.3, we are now saying the registrar must allow the RNH to invalidate the TAC for a period of 24 hours after the notification of TAC issuance is sent. Now I need to mull this one over. It seems very weird that we are giving an RNH 24 hours to invalidate the TAC, while if you already obtained the TAC within those 24 hours, you can already start a transfer. It feels very weird to me. But again, I will read this. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Yeah, and as we discussed last week on this one specifically, we had talked through it. I mean, a registrar really has 14 days. And as you mentioned, you know, obviously if it gets used, then you can't invalidate it. But if it has 14 days to invalidate the TAC, at any point, they can go back to their registrar and tell them they don't want to transfer it. So I don't think that 11.3, after discussing it last week, was necessary as, again, the timing-wise works, you know, up until use. So it's one of those things, you either have to tell the TTL or use time. So I don't think 11.3 adds anything to our recommendation on that. But Rick, please go ahead.

RICK WILHELM: Thank you, Roger. I think that 11.3 is actually confusing things because it almost implies the way it's written that the registrar would not be

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allowed to invalidate the TAC after that 24 hours. And I think that we've got other recommendations in here that clearly allow the registrar, that the registered name holder is allowed to invalidate the TAC at any point in time up to its expiration at 14 days. So I don't understand what 11.3 is doing other than confusing people, readers, that is.

ROGER CARNEY:

Great. Thanks, Rick. Yeah. Again, I think that's the conclusion we got to last week is 11.3 was not needed. As Rick just mentioned, and as people said, it is already handled elsewhere. So I think we're good there. So I think we can say we can drop the 11.3 idea. But I wanted to turn back to more so the privacy proxy issue. And does this wording, you know, the public comment came in about this. Does this wording help that? And I don't remember if we had the discussion last week about, you know, privacy and proxy are required to, you know, forward on notifications anyway. So it seems a little weird that if a notification goes to a proxy service that is already forwarding on the notification that they get, the registrant would get two notifications that if you're doing that that way. So I don't know. It seems that it could cause some confusion there because multiple notifications could be set. Theo, please go ahead.

THEO GEURTS:

Yeah, I'm a little bit on the fence with that one. Initially, my thinking was like this language is not required, but giving the complexity of things within the ecosystem, it might be handy to sort of spell out that the notifications, the TAC, and all that good stuff goes to the underlying customer at all times, even if there is a utilization of an affiliated privacy

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or proxy service provider. I think, yeah, I think we should keep it in. Thanks.

ROGER CARNEY:

Okay. Thanks, Theo. Yeah. And I agree. I mean, it's one of those where it's, is it helpful or is it? Yeah, it's, you know, we didn't call it out, you know, obviously we didn't make anything in our normal, our first recommendation that went out public comment. So that's why it came back here. So Rick, please go ahead.

RICK WILHELM:

Thank you, Rick Wilhelm. Registries. This is a registrar requirement. The registries don't have a dog in the proverbial fight. I don't condone dog fighting. So that was a colloquialism. So please don't get riled about it. But I only bring this up to offer that as far as I can tell, this is the only point where we're talking about notifications that I recall where we're talking about notifications going to the underlying customer, the proverbial underlying customer, if the RNH is utilizing an affiliated privacy proxy provider. And I'm not sure why it mentions merit here in Rec 11 regarding notification of TAC issuance, because I don't think this is a particularly special notification. It is not first among equals or anything like that. And I think that I would encourage those who care about this to make a more considered and general decision about that and not in regards to TAC issuance, because I don't think we should be doing one off contemplation of notifying the underlying customer with this particular single notification about TAC issuance. Rather, we should consider the more general case about what we're doing in terms of

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notifications in the context of affiliated privacy proxy providers. And with that, I will step back and let the registrars comment about it. Thank you.

CATHERINE PALETTA:

Thanks. This is Catherine Paletta for the registrars. I tend to agree with Rick that if this comment, if we want to keep this in, it should be kept for all notifications, right? We should have a standard rule about notifications. But I also, not to be too nitpicky here and channeling Owen a little bit, does it make sense that to say this for a privacy provider, if the registered name holder for a privacy provider is the registered name holder, it's the same person, versus a proxy provider is the registered name holder, and you'd have to reach the guy, the licensee of the proxy service.

I don't know if this is the distinction we want to make, but Owen has become a champion, and it's like seared in my brain, the difference between privacy and proxy. And then we get into it matters of whether it's affiliated and all this kind of stuff. And now I'm, I think I'm making this into a bigger mess, but would this be an only an issue for a proxy provider? Thank you.

THEO GEURTS:

Yeah, Rick is correct. This shouldn't be here. I think it's more of something you would put in the definition where you want to make sure and try to explain what a customer is or what a registrant is to make sure that you don't get into a discussion like, oh, but the customer is actually a privacy service. So you don't, let me back that up a little bit.

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You don't want to get into a situation where a registrar can sort of deny any kind of transfers because we have fuzzy definition of who a customer is. We don't want to have that.

So this is a definitional issue where we need to make clear what we actually trying to achieve here. And the moment we've done that, then we are in a good space and it shouldn't be in this recommendation. As Rick pointed out, this is the only time we mention it. That does make a lot of sense to me also. I don't know, it should be a definitional thingy way up there or way below wherever we put the definitions. I think way on top there. Thanks.

OWEN SMIGELSKI:

I would tend to agree with what Rick suggested and then Catherine seconded that it's either every communication sent via the transfer policy should be the same. It shouldn't be just this one called out for sending it to the underlying beneficial user or registrant or whichever it may be, whether it's a privacy proxy service. So that is a good point and we should figure out which one we're going to do.

I would lean towards just sending it to what's there in the privacy proxy in either RDDS or whatever there and not the underlying customer because there may be a time when a registrar or may not have that. If it's an unaffiliated privacy proxy provider, if it's a 100%, you know, it's affiliated, but it's a 100% independent separate system proxy provider where the registrar may not have access to that, maybe rather complicated to kind of send it there.

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I must admit, I have experience working for one registrar, so I don't know how other registrars work to this outside of what my own registrar does. So we may want to make sure that whatever we're doing here is consistent, but then also doesn't really overcomplicate stuff. So I think it should be good to do just, you know, the notification to what is listed there in the public who is.

ROGER CARNEY:

Great. Thanks, Owen. Yeah. And again, I think as Jothan's point out, you know, the registrar accreditation agreement of, you know, requires the relay of this information anyway. And everybody's talking about, you know, specific definitions. So let's leave the definitions to other places. As someone mentioned, you know, maybe this comes out of the privacy accreditation process that's going on now. But to the point of the public comment and their concern of making sure that the user is getting notified, again, the affiliated, again, the RA requires that the relay has to happen. So they should be getting it. So I don't think that we have to make a specific call out here as everybody's noted. So I think on 11, we're down to, if different, it seems to be what the group has agreed to, and the other two items here aren't needed as it's covered elsewhere. So okay. I think that takes us, this was the last updated one, right, Caitlin?

CAITLIN TUBERGEN:

Yes.

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ROGER CARNEY: Okay. So I think we can move into the new ones today, our homework, and Caitlin will take us through those.

CAITLIN TUBERGEN: Yes. Thank you, Roger. We'll begin with Recommendation 13. So Recommendation 13 is about TAC as a one-time use. This is a new security enhancement that the working group recommended for the transfer policy. There were a few comments related to the TAC being one-time use from registrars, and essentially the issue that registrars are pointing out here is that oftentimes registrars will check the validity of the TAC themselves before submitting it to the registry operator, and they wanted to include some language in the recommendation text that made clear that registrar testing of the TAC does not invalidate it or is not to be included in the one-time use concept.

So with that understanding, if we can look at the proposed update to this recommendation, and of course I invite any of the registrar commenters to comment here, but what we've done here is to add a parenthetical to the end of the recommendation, which just points out that for the avoidance of doubt, registrars may confirm the validity of the TAC prior to initiating the inter-registrar transfer. This confirmation or read-only verification of the TAC is exempt from the one-time use requirement. So with that, I will turn it over to Roger. I see we already have folks in the queue. Thank you.

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

RICK WILHELM:

Sure. So I did a fair bit of research on this one coming into this call because I know that previously the registries were talking about basically saying no to this one. But I wanted to make sure that if we were going to say no, we sort of had our ducks in a row. Apparently, it's animal analogy day. We'll leave the dogs alone. And one of the things I did is I went back and read my own document, 9154, and it turns out that since that this is already accounted for in 9154, because section 5.3 in RFC 9154 has a requirement for the registry, it says, for the info that command, the registry must allow the passing of a non-empty authorization info value, aka a TAC, for verification. The gaining registrar can pre-verify the authorization info provided by the registrant prior to submitting the transfer request with the use of the info command. Registry compares the hash of the past value with the hash value stored for the object.

So net net, this is already in the RFC. Now, why does that not count for it? Why does that not break the one-time use? So I, after discovering this, you know, I went back and Jim Gould and I got on the phone with Jim Gould and we were talking about this. He went back to his notes and we were talking about this. And the reason is, is because info is a non-mutative operation. And so therefore, it really comes down to the definition of use, not the definition of is, the definition of use. And so when you're using, when the TAC shows up in an info command, it doesn't, is not deemed to be used. And so therefore, compliance with RFC 9154 actually requires the info implementation to do what we're talking about here.



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So, I don't know if we need this or not, but because also it's not really a may, it is a may by the registrar, but the registry must support it since it's a 9154 compliance issue. So, shrugs shoulders. And I think we can go forward because I don't think this is a, this isn't really controversial. Thank you.

ROGER CARNEY:

Great. Thanks, Rick. Yeah, and thanks for digging into that and getting to that and explaining, you know, obviously the non-transactional or non, the, I can't remember the term on the two, but the info not being, you know, an editable command, so it's not using, as you say, and as you say, the definition there is on the use part. So, the one thing I do like about having language in the policy is then the technical representation in the RFC has support somewhere.

And it goes back and forth, but that's just my own preference. But, Jothan, please go ahead.

JOTHAN FRAKES:

Yeah. Thank you. And, and Rick, thank you for all the research on, you know, kind of chasing that out. I know that we had teased out aspects of how, you know, if a registrar would be able to submit this, they could theoretically, you know, kind of brute force, with enough time, you know, this one-time TAC, but, you know, ultimately the purpose here is really identical to what's the status quo is that, you know, there's a lot of cart systems, a lot of, I guess, transfer integrity that leverages the info command and, and how the current functionality works that, you know, there's just a desire to kind of preserve that and the hope is that, you

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know, by leaving this wording in or having this wording in here that, you know, if there were registries that had not implemented this or had it implemented in a, you know, sort of a strange standard way, or we're hoping to remove the ability to, you know, do this test that they would not remove it if they weren't using it and that they would add it if they weren't supporting it. Such that, you know, this would be something we'd have consistently across the board as we go through and change things. Anyway, thank you for the confirmation.

ROGER CARNEY:

Great. Thanks, Jothan. And again, thanks Rick for digging into that and finding the specific RFC detailing this. I will ask Rick or registries and Jothan, we don't need to do it here. I don't want to do it here, but make sure what's bracketed here makes sense. Or if there's suggested edits here, please put them in the document, to clarify and clean up any issues here. Again, I don't know if we had to reference the RFC or not, but I just want to make sure this language makes sense, beyond, you know, this one group that's talking about it. So, I'll ask you guys to take a look at that and put comments in here if there's any edits needed. I don't want to do it here, but, please take a look at that over the next week and write any input there. Okay. I think, we are good here, Caitlin, and I think we can move on.

CAITLIN TUBERGEN:

Thanks, Roger. So, we're actually going to go back to recommendation three. The last block of recommendations dealt with all of the TAC related recommendations and some definitions. Recommendation three was part of block two of review because it deals with transfer restrictions. However, it shows up as recommendation three, because as

a reminder, the recommendations are in the order of how a transfer typically takes place. So as a reminder, recommendation three is about the initial transfer restriction after a domain name is registered.

So we received, not surprisingly, a lot of comments on this recommendation. It's not surprising because this recommendation was the subject of a lot of comments. So I'll do my best to summarize the comments and invite folks to provide additional context, but essentially we had some commenters who believe there should be no restriction after initial registration at all. And that is, noting that some of the concerns initially with credit card chargebacks and fraud can be resolved almost instantaneously in today's age. So this isn't really a necessary restriction. Other commenters who oppose the restriction noted that there wasn't really evidence in the working groups' initial report as to why this restriction is warranted and suggests that in the event the working group believes this should continue or should remain, that there be more evidence, or examples as to why the working group thinks this is necessary.

Some commenters understand the reasoning behind the restriction, but recommend shortening it from 30 days to five days. The comment about days versus hours remains. There were a couple of small nits with the language, which will, about prepositions, which we'll show in the yellow box, there were comments about the initial registration date. As you'll see, there's a footnote there that talks about that that date corresponds to the creation date and the RDDS this comment or notes rather than have the footnote, why not just put creation date and make it clear in the actual text.

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And then there were some differing opinions about the next portion. So there was one commenter that noted that the second sentence of the recommendation, in other words, to the extent that a registry sentence should be moved to implementation guidance instead of in the text of the recommendation. Whereas another commenter noted that the text in footnote two should be moved into the body of the recommendation rather than a footnote. And this commenter noted that footnotes are not authoritative. And if the working group wants to specify that any sort of existing RRA that has a 60-day post-creation lock now needs to change that to 30 days, this commenter thinks that language should be actually in the text of the recommendation.

I think that is kind of a high level of the comments we received with this recommendation. So again, some are in favor, some are not, some think it should be shortened. Some think that there needs to be more evidence. And then the actual construction of the recommendation in terms of what's a footnote and what's not, and what's implementation guidance and what's not is kind of up for debate. So what we did in the yellow box, you'll see that there was a suggestion to change the words within and of, so now it says that transferring a domain name to a new registrar for 720 hours from the creation date and those highlights note when there's been a change from the original text, the next block of text, for the avoidance that's footnote two being moved into the body of the recommendation or the actual recommendation text as requested by a requester or a commenter.

And then also, the second sentence in the original recommendation is also included here as implementation guidance, as that was another comment or suggestion. So with that, I will turn it over to Roger, but I

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will give one more caveat, which is that, we kind of talked about this last week, but for those who weren't there, when the group is looking at comments, it's important to consider new information rather than rehash debates the group has already had. And that doesn't mean we can't talk about the comments received, obviously, but if the group has already kind of had these same debates, we'll focus on new information that has been received during the public comment forum. And with that, I will turn it over to Roger.

ROGER CARNEY:

Great. Thanks, Caitlin. And thanks for saying what I was just going to say. Again, as we go through these 10 or 12, whatever it is, recommendations, there are a lot of things that we did talk about. So there's a lot of comments that are not new. So it's one of those, if there's something new in them, we can tease that out. If there's nothing new in them, we'll probably just kind of skip over them and not worry about them and refer them to our rationale and discussion. But I think, you know, the edits to the first sentence seem to make sense and there shouldn't be, I don't think, a lot of issue there. Creation date, and we'll have to get into, you know, I assume that means footnote one goes away and then we have to renumber all our footnotes later, but whatever. But I think the bigger part is the second part. And should that text be in here? Should it be implementation? And that's a good discussion to have, I think. So Theo, please go ahead.

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THEO GEURTS:

Yeah, thanks. And that was basically my comment. Should it be up to implementation? And I think the answer is no. And my thinking is here sort of based on the previous PDPs and IRTs, which I've been a part of. And always the discussion to leave things open-ended within a PDP, even make decisions as a working group like, okay, we can't get really get to a good consensus here or a good recommendation. You know, just leave it up to the IRT. That basically is not a good idea because the IRT will struggle again if we don't have clear recommendations.

I'm not saying that this is an example of that. I'm just pointing out in general that, in my opinion, PDPs, working groups should be as clear as possible with their recommendations and not leave things up to an IRT for whatever reason they have, because it's hard, it's tough, it's complex. That usually doesn't end well. So that is just a general comment. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. And it's a good point to raise. As anyone on here knows, you know, when you get into IRTs, you're trying to work on, you know, what you have in front of you. And then what's not there, you have to start trying to figure out what the intent was. So as Theo points out, it's best to be as clear as possible and not leave things optionally if that's what was needed or wanted. So to that point, thoughts on basically moving the footnotes into the recommendation is basically what we're talking about then. Anyone have concerns, comments about that? Again, I think that, you know, Theo's point, it makes it pretty clear that we should try to be as clear as possible. Obviously, there are times

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where we can leave some flexibility for implementation. But thanks, Rick. Theo, please go ahead.

THEO GEURTS:

Yeah, well, it seems that Rick is agreeing with moving the footnotes. I was actually going to make the counter argument because with the new evidence provided, I don't really see any reasons to move there. But if the working group says, well, that's actually good information, and we should move that right into the policy itself, into the recommendation. Yeah, sure. By all means. Thanks.

RICK WILHELM:

For the avoidance of doubt, that is clearly intended to be normative. And so therefore, I think as a reaction to that, I think we need to move at least footnote two into the thing and maybe footnote one, because I think while it's making it more compact, if we're concerned at all about this not sticking, then we just make it be longer. And, you know, so what, we're not paying for the column inches, right, in this case. And so if it's in a little bit bigger font, and it makes it a little bit longer, then we'll just make it break it into a couple paragraphs. It doesn't really matter. So let's just do that since someone, at least, at least some reader was sort of, well, it's not normative. Well, okay, fine. It's now normative. Thank you. Drive through.

The other thing that I just wanted to offer, and I have an odd familiarity with the variety of agreements. This appears in some registry agreements, too. We mentioned registry registrar agreements, but this appears in at least one, this 60-day lock appears in at least one registry

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agreement. Because not all the registry agreements are standard. So I don't know if we want to mention that here in the text or not. But it's that it's something that we might want to think about. It's not just an RRAs. Thank you.

ROGER CARNEY:

Great, thanks, Rick. Okay, so I think that I think the discussion is good that we, we do be very specific here and put this into the recommendation. And as Rick said, and I'll say, Rick said all that without any animal reference at all. So that was good. But I think it's good to hear. And I think we can add that in Rick about registry agreement as well. So, and I don't think we need the implementation guidance. I think we leave that as we've talked this through. Let's be specific if we want it. Let's put it in the recommendation. Let's not let this get into. Well, was that what they really needed or wanted? So I think it's good that they're both here. And I think we can add the registry agreement in here as well. So. Okay, great. I think we can move on to the next one. Caitlin.

CAITLIN TUBERGEN:

Thank you, Roger. The next recommendation would be recommendation 14. As a reminder, recommendation 14 is about the maintenance of records. There were a couple of comments here. There was a piece missing from the records. And that was the IP address addresses associated with providing the TAC to the registered name holder, I believe, was the concern. Which this commenter is noting that knowing the IP address where the TAC was provided can provide crucial



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information in the event of a dispute. So they suggest making that clear that that is included in this.

The second comment was about providing the TAC to the registered name holder, because the definition of TAC also includes the language of or their designated representative. One of the commenters noted that that should be included here. That if the TAC is indeed provided to a designated representative, the records are also required to be kept for that instance. And then there was another comment about simplifying the language in the last sentence, noting that all of these provisions are bound by applicable law, and that the records would ultimately fall under the ICANN Data Retention Specification, and that the registrar needs to provide those records upon reasonable notice. So you'll notice that that commenter is removing the reference to the timing. That might be because timing can change depending on laws, but I invite anyone who has a concern about that particular clause to provide further context here.

But based on what I just provided, you'll see that we've added in the yellow box an addition of were there designated representative in terms of the records, and also provided the exact language that the commenter requested replacing the last sentence with, which is these records fall under the ICANN Data Retention Specification. The registrar must provide such records to ICANN upon reasonable notice. We did not include a reference to the IP addresses that the one commenter noted, because we weren't sure if that was included in the reference to all records, if that's something that registrars generally keep, and so that's a question to the working group of if that is a concern of others, and if it needs to be explicitly noted in the recommendation text. So I'll turn it

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back over to Roger, and if we mischaracterized any of the comments, we invite working group members to provide further context about their comments.

ROGER CARNEY:

Great. Thanks, Caitlin. Yeah, and actually, I think, you know, the IP came from George, and I think the bigger concern that he had was this recommendation is great, you know, he said it was a good step forward, but it's only on one side. It's only the losing registrar that's doing this record keeping, and we're not forcing the gaining registrar to track where the TAC was used from. So I think that's one thing to think about, is does that make sense that we would include something about the gaining registrar having to maintain logging for where the request was made from, and those details around that, where that TAC was used, but I think that's what George's point was, so just something to think about as we go through this.

THEO GEURTS:

Yeah, thanks. So I think it's wise to not go into the IP issue here, when it comes to IP addresses, to avoid any avoidance of doubt, because when we talk about records, and I'm just strictly speaking for myself here or the company I work for, we do indeed record IP addresses, so we do know who did what on which time, but, you know, to go from there to sort of go like, use it for disputes, I would stay far away from it. I mean, those IP addresses, you know, if somebody uses a VPN, you get another discussion there. I mean, and I don't think we should go into the discussion, because we have, the IP is not the source of information

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where you sort of can pinpoint, make legal decisions on. So I think it's wise to stay away from that discussion. Should you do good record keeping? I think you should do, but not for disputes and definitely not within a policy of this kind. Thanks.

ROGER CARNEY: Great. Thanks, Theo. And I'm trying to read through Owen's thing, so I'll go to Owen so he can speak to it so I don't have to read it.

OWEN SMIGELSKI: Oh, goodness, Roger. I'm not going to read it for you. This is Owen. So I just, while this was coming up, it kind of triggered mentioning IP addresses and log files. I put into the chat the RAA's data retention specification, where section 1.2 requires that a registrar collect and maintain information for no less than 180 days, and then the next section includes log files, communications, things like that, including, you know, source IP addresses, stuff like that. So it's quite possible this stuff would already be covered for both the gaining and the losing registrar under the RAA. I haven't, you know, taken a specific look at this with regards to these requirements, but that's something we may want to consider. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Okay, so I think we've handled the questions then, and I think our updates here are specifically addressing those comments from the public, and again, I think the one teasing out of the George on the gaining side, I think Owen hits on it in that it's actually already

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required. So, okay, any other comments on this? Okay, I think we can move on to the next one, Caitlin.

CAITLIN TUBERGEN:

Thank you, Roger. So moving to recommendation 15, there's just a small comment on this one. As a reminder, this recommendation is about eliminating the gaining FOA from the transfer policy due to the reasons named in the temporary specification. There was one comment from INTA, I believe, noting that they support the elimination of the gaining FOA so long as the losing FOA remains. And currently, there is a recommendation to retain the losing FOA. So we could revisit this later if the working group ultimately determines that it would like to eliminate that. But currently, there is a requirement to send a losing FOA. So are there any comments?

I don't see any hands raised on this, so I think we can move to the next one. Recommendation 16 is about the registry transmission of the IANA ID to the losing registrar. There was support for this recommendation. There was, however, one comment from ICANN.org that I wanted to highlight. And I will just read this and invite my ICANN.org colleagues to speak to this if there is or mischaracterizing anything.

But essentially, this group did talk about how some registries use the IANA ID in these transmissions. Others do not. And ICANN.org is noting that the registries that do use different IDs may need to implement an EPP extension to provide this information via EPP. That could require registries and registrars to work in the IETF to standardize the extension. So in reviewing the recommendation, my ICANN.org colleagues were

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unclear if this recommendation requires providing the information via EPP or if providing it offline would be an option. So, Roger, I'll turn it over to you.

ROGER CARNEY:

You bet. Thanks, Caitlin. Yeah, and again, I think that this was intended to be via EPP, just to answer that. And when we talked about this, we knew that some registries use different internal IDs versus IANA IDs, and we knew there was going to be an effect there. But Rick, please go ahead.

RICK WILHELM:

Thanks, Rick. We're home registries. So this is all about GTLDs because we're in the ICANN world. And so consequently, we're always trafficking in IANA IDs. So I'm not really understanding ICANN.org's comment because we're not talking about facilitating transfers in a ccTLD environment where those of us that work in and around that world know about the challenges of dealing with registrar IDs.

And so while this statement is true, the comment is true, I just don't understand its relevance here. And so I sort of shrug my shoulders, and I don't really know that there's any change needed at all because I don't think that the policy should be encouraging or doing anything to support or promote or help any registry that's doing its work in the IANA world and not referring to registrars in some other way other than their IANA ID. Thank you.

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ROGER CARNEY:

Great. Thanks, Rick. And you must have channeled what Theo was going to say. And I would agree. I think that, again, when we talked about it, we knew this deference. And again, ICANN just made a comment. Didn't say anything had to change. They were just providing this knowledge for everyone. And I think, again, I don't think this is new. We kind of talked about it. So okay, great. I think we can move on to the next one.

CAITLIN TUBERGEN:

Okay, thank you, Roger. The next one is recommendation 17, which brings us to the losing form of authorization. There were a few comments on this recommendation. The first comment is that the opening part of the recommendation that talks about how the working group did not ultimately reach agreement to eliminate or change the losing FOA should not be part of the recommendation text. That should be moved to the rationale for the recommendation and why the working group is ultimately recommending keeping the status quo largely in place.

The second change or the second comment was that the losing FOA should be eliminated entirely. And that was a callback to, I think, early on in the working group's discussion, there was a suggestion that this really wasn't necessary anymore, particularly because there's new notifications about the TAC and the notification of transfer completion that maybe this wasn't needed anymore. The second comment or the third comment rather was similar to other comments. There were the comments about calendar days versus hours. And there was also the similar comment about the language of the registration agreement, that

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if it is in English, we add the parenthetical, if different, that it would need to be provided.

And there's also a comment about, I think I already noted that there was a comment about removing that losing FOA entirely. I think that was all of the comments in summary. So if we can go down to the edited version, you'll see that at the top, there's a cross through of that text about the working group not reaching agreement. And that comment or suggesting we remove that because it's not really the recommendation, but ultimately put that in the rationale.

Because of that, we've added a parenthetical noting what the working group is talking about, which is the minor modifications to the standardized form of authorization or the losing FOA. There was the comment to add if different in 17.3. There was a comment to remove references to calendar days. And then lastly, this was the comment that I neglected to mention. In proposed 17.5, there was a concern from one of the commenters that there should not be a mechanism within the losing FOA to immediately approve a transfer.

And that is because the registrar can contact its registrar if it wants to approve this transfer immediately, but it shouldn't be housed within this notification because of fraudulent reasons. I think that is a summary of all of the changes based on the comments we received. But I will turn it over to Roger to see if anyone has any additional context to provide or any reactions to the text changes.

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ROGER CARNEY:

Great. Thanks, Caitlin. Yeah. And again, I think most of this seemed to make sense even with the rationale part. That seems like it is somewhat rationale. And I think that obviously the bracketed text has to go in here if we're removing that rationale. So I think that makes sense. But I'll leave this open to everyone else. The changes on 17.3 and 17.4 don't seem to be issues. I would open the floor up mostly to talk about 17.5, a new 17.5.

But obviously, anybody can talk about anything here. But the 17.5 is a lot different than what we do today and what the working group suggested. So I think that this is an argument I've never heard of before. Maybe we did talk about it before. I don't remember. But I think that it's worth taking a look at. Again, this changes what occurs today and what we were planning. So thoughts, comments, questions on this? And I think that this came from Tucows.

So if anybody from Tucows wants to address it specifically or not, again, this is a new suggestion. So I think it's worthwhile taking a look at. And again, we don't have to decide on it here today. We're talking about it and just trying to talk around it. So let's talk about it and then we can make decisions. So Rich, please go ahead.

RICH BROWN:

Hi. Rich Brown, for the record. I feel kind of called out there working for Tucows here. But right now, the confirmation email, the way it currently works, there is no requirement to send an approval or a denial. But the, well, no, there is no requirement to send an approval. The point is, and I don't want to get into the email is secure, insecure debate. But the main



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point is most hijackings and whatnot are done via compromise. So if an EPP key is sent to a compromised email, why are we sending the confirmation of the transfer to that same compromised email? This just adds an extra step to the process. For example, I mean, it's not really an extra step. It's just moving it away from the email. It's separating the delivery of the TAC from where you can confirm it as well. It also gives time to the RNH to actually utilize this notice. Because if they've been compromised, and the purpose of this notice is to inform them that somebody has to attack, well, we've also included in this notice the means to just steal the domain effectively by clicking Affirm. So just wanted to point that out. That's the reasoning behind this. Thank you.

ROGER CARNEY:

Great, thanks for that, Rich. It does help. And I'm sorry if I called you out, because I did call you out. But I think that helps talk through that issue. Again, I don't want people to decide. I want people to think about this. Does it make sense? And is it something that the group wants to talk about or agree to? So I think that that's a good point. And I appreciate that, Rich. We are down to two minutes left. So Caitlin, do we dare take a look at the next one? Or do we just close out?

CAITLIN TUBERGEN:

Thanks, Roger. The next one is everyone's favorite, Recommendation 18, where there were a lot of comments. So we might want to cover that next time. But I will use this opportunity in the last 30 seconds to just remind the group that the next block of homework is for the

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recommendations related to the change of registrant data. So that is specifically Recommendations 25 through 28.

There aren't as many recommendations in this block, so we hope everyone's able to get through that reading. But as is probably suspected, there were a lot of comments on the changes to the change of registrant data policy. So it's important for everyone to read those in advance of our next call. I'll turn it back over to Roger in case you have any closing comments.

ROGER CARNEY:

Thank you. Great. Thanks, Caitlin. I don't have anything to add. Just again, great, great job on today's call. We didn't get through all of the items here, but we didn't expect to either. So I think, as Caitlin said, the homework is review those comments for those remaining recommendations through 28.

And we will discuss and we'll start back here. But we'll walk through just as we did here, proposed updates, that were discussed today. We'll continue on our discussion of these and then also on the homework assignment. So I thank everybody for their time and their diligence on their homework. And we're getting halfway there. So I think we're making good progress and we'll continue to do so.

So everyone have a great day and we'll talk to you next week. Thanks.

**[END OF TRANSCRIPTION]**