

JULIE BISLAND:

Good morning, good afternoon, good evening, everyone. Welcome to the DNS Abuse Mitigation PDP1 Working Group call taking place on Monday the 6th of July, 2026. For today's call, we have apologies from Dennis Tan, RySG; Mary Penn, IPC; and Kathleen Scoggin, ALAC. Alternates are Chris Disspain, RySG; David Hughes, IPC; and Eunice Perez, ALAC. We also have a tentative apology from Anil Jain. Statements of interest must be kept up to date. Please raise your hand or speak up now if you have an update to share.

All right. Members, participants, and alternates will be promoted to panelists. Please watch your screen for the prompt to be promoted. Observers will remain as an attendee and will have access to view chat only. All documentation and information can be found on the wiki space. Recordings will be posted shortly after the end of the call. Please remember to state your name for the recording. And as a reminder, participation in ICANN, including this session, is governed by the ICANN Expected Standards of Behavior, the ICANN Community Anti-Harassment Policy, and the ICANN Community Participant Code of Conduct. And with that, I will turn it over to our chair, Paul McGrady. Please begin, Paul.

PAUL MCGRADY:

Good morning, everybody. This is Paul. I'm on my mobile phone because my laptop has decided to not cooperate this morning. And we are going to do our best, and hopefully I can get over to a laptop where I can do a little bit better job. So our welcome, this is it. PDP updates,

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let's roll through those. Just this is our usual screen. If it's moving, I'm not seeing it on my phone.

JOHN EMERY: Sorry, Paul, we have a hand from Thomas.

PAUL MCGRADY: Oh, Thomas would like to say something about the welcome? Okay. Thomas, go ahead.

THOMAS RICKERT: Thanks, Paul. Not exactly on the welcome, but I wasn't yet promoted to panelist when the question about statements of interest was asked. And indeed, I have an update to make or to announce. I am now, in addition to the previous positions, managing director of a company called Evigate, and we are helping companies with their compliance requirements for the e-evidence package. So that's my latest update. Thank you, sir.

PAUL MCGRADY: Ah. Great. Thank you very much. All right.

Great. So we are on our where we are. You can see here our running man is in July. In July, we will review the draft initial report. We've had that out for a week for comments. No comments received. I'm not surprised by that. We've spent a lot of time with the language, so nothing in there should be a surprise, but we've got a little more time to

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let that percolate. And in July, we will complete all the evaluations, human rights assessment, and data protection, and all those things. In August, we'll finalize the draft initial report. We'll have a working group consensus call on that, and then we will start the public comment period. In September is our public comment period on the initial report. We'll do some webinars to present the initial report to the community. And then at ICANN87, we'll have four working group sessions discussing the public comment, adjusting the report as necessary, and we'll draft the initial report. I don't think we're going to get a consensus call in, just because of the calendar, while we are all together, which is kind of too bad. But we will have that, I think, shortly thereafter. So the bottom line here is that we are on track. Recording in progress.

JULIE BISLAND:

Paul? I think we lost him.

TERRI AGNEW:

This is Terri. He's rejoined, and I am sending Paul the additional Zoom prompt, and he's rejoining as a panelist. Give him one moment, please. And I believe Paul has been promoted there. He's back.

PAUL MCGRADY:

Yep. I'm back. Sorry about that, everybody. All of a sudden, my efforts to become a real boy happened. So I am on the laptop. Yay. So that's where we are. Any questions on the timeline?

All right. Let's go in on the review of the draft initial report. As I mentioned earlier, we've had this out now for a week. There's not been

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any comments on the draft. Like I said, not surprising. We've worked with the language for months at this point. Everybody should be very familiar with it. But we do want to give it proper air time. We're going to keep it open at least through the next call for folks to take a look at it and get comments in. As Farzi says, a week is not enough, but we can't hold it open forever in the hopes that somebody might comment. So if you have comments, get those in there. But any comments at this point? Just a reminder about the assignment. We, as a working group, are to review the draft initial report, look at the recommendations holistically and as interconnected items since they're all related to the Associated Domain Checks, provide feedback, suggestions, alternate language, and comments into the document. This is not an invitation to relitigate things that we've talked about, but if there are major flaws that suddenly occurred to you or things that you don't think we got down right, this is the time for that. And then you can put the suggestions into comments rather than attempting to change the language. That'll help us keep better document control, and then staff can capture those.

Let's move on to the next screen. Key principles when going through the language. The goal is for the working group to provide recommendations for new obligations on ADC so that they can solve the issue as described in the charter, they can receive council support, they can be board ready, and they can be implemented and enforced by ICANN org. All this is stuff we've talked about in the past, so nothing new here. So as you're going through the initial report, do the textual review. Do we solve the issue that's actually described in the charter? And then put on your representative participant hat, and think about

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gathering up your community. What does your councilor think about this report? Is it something that they can stand behind come council time? We need to hear from our board liaison about board readiness. What do they think? Did we do it, or are we going to be handing council something that they will then hand the board, hopefully, and the board will have to say, "No, that doesn't work." And I know we've already heard from compliance staff, but would love to hear from them. Do they think that what will come out of the IRT based upon our policy recommendations is something that they can actually understand and enforce, and all that.

So, I guess before we move on to this next screen, any comments other than Farzi's, which I take as there will be comments, so I take that as a promise that they're going to start tearing this thing up. Any questions, comments from anybody else on this? All right. Well, you know what? A quiet initial report is not a bad outcome. That just kind of means either we all love it or we're just talked to death about it, I can't tell, or some combination of both.

All right. Let's move on to resolving pending "cannot live with" items. We're now in about week four of attempting to solve these. So we're solving them. The first one, I hope we're there. So we've got some language in red that came out of our more recent conversations. I'll just reread this in its entirety. So the GAC proposed language for the working group consideration, for Preliminary Recommendation 1, which is: when a registrar has actionable evidence that a Registered Name is being used for DNS Abuse, even if the Registered Name is not active at the moment of check, pursuant to Section 3.18.2 of the Registrar Accreditation Agreement, the registrar must perform an Associated

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Domain Check. For the avoidance of doubt, this requirement must not extend to compromised domains. So there's a whole bunch of compromised language that is that Preliminary Recommendation 1. The language in red, I think, is what is new for us to think about.

The proposed language for implementation guidance is: when reviewing actionable evidence for the purpose of ADC, the phrase "is being used for DNS Abuse" is not limited to DNS Abuse that is active at the time of review. Registrars may rely on actionable evidence of current, recent, intermittent, recurring, or otherwise well-evidenced DNS Abuse, including where the domain is no longer active or the abusive activity has ceased. Abuse reports submitted to a registrar should include sufficient information and evidence to support the reported allegation of DNS Abuse of the current Registrant. That's the new language from last week. See actionable evidence rationale. Where the reported abuse is intermittent, recurring, or otherwise not continuously observable, the report should include evidence clearly demonstrating the pattern of abusive activity. And then for the language of the rationale, Recommendation 1 is not intended to create new obligations for registrars to retain historic abuse information beyond existing contractual and legal requirements. So, I hope this gets it. And Volker, your hand's up.

VOLKER GREIMANN:

Yeah. Our main concern with this is that it actually leaves the area of ADCs and tries to regulate what regular abuse checks should look like. We are saying that the ADC is triggered on an abuse check where we find that there's actionable evidence of abuse, and now this language is

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trying to define what is basically our obligation under the RAA, and I don't think that's where we want to be. That's not where our focus or our scope of the work is, and, therefore, I think we should remove that. Even though it does make some sense, and I absolutely understand where this is coming from, I think it is out of scope for our work because it basically delves into the realm of standard abuse checks and defines those. Thank you.

PAUL MCGRADY:

Thanks, Volker. What part specifically would you like to see removed? I want to see if your comment's implementable. Is it comma, pursuant to Section 3.18.2 of the Registrar Accreditation Agreement, RAA? Is that what's causing your problem?

VOLKER GREIMANN:

No, even if the Registered Name is not active at the moment of the check, because that basically defines how we must address abuse complaints, and I don't think this is the space for that. Thank you.

PAUL MCGRADY:

Okay. And I guess I'm going to ask, Volker, before you go, is that a Volker position or the registrar position?

VOLKER GREIMANN:

Well, we don't vote on our positions, so we've discussed it, and many registrars share this position. I'm not sure if it's a 100% registrar

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position. I'll let other registrars comment on that, but it's a common position amongst registrars, yeah.

PAUL MCGRADY: Okay. And I see GoDaddy is aligned with this position. Carlos, can you clarify that in the chat? Do you mean Volker's position or the position in the language in front of us? Martina. I'm sorry, Carlos?

CARLOS BECERRA: Oh, yeah. I thought you were saying it to me.

PAUL MCGRADY: Yes, I just asked for you to put it in the chat, but that's okay. Which position?

CARLOS BECERRA: With Volker's position, I think this opens up the checks, and it makes it way too broad. I think over time it would be untenable.

PAUL MCGRADY: Okay. Martina, go ahead.

MARTINA BARBERO: Thank you very much, Paul. And just to clarify, because at this point maybe the GAC is a bit unclear on where the registrars stand. So the registrars are okay with the language for the implementation guidance,

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but not okay with the addition in the main recommendation. Is that correct? Just to try and understand where we are.

PAUL MCGRADY:

Yeah. Thanks, Martina. Volker, can I get you back on the phone and you can tell us whether or not that's correct, that it's the language in the recommendation that's the problem, but not the implementation guidance?

VOLKER GREIMANN:

Yes. Ultimately, our working group should be laser focused on when ADCs are being triggered, and the trigger has to basically follow from our regular obligations of dealing with the DNS Abuse. So the language in Preliminary Recommendation 1 is the main issue.

MARTINA BARBERO:

In that case, if I may, I think that the GAC is ready to be flexible on the inclusion, maybe on the recommendation itself, but I suppose that then the implementation guidance says the same thing, just in the implementation guidance instead of the recommendation. So, in the implementation guidance, we are saying that it's not just in the context of ADC, it's not just the domains that are abused at the moment X of the check. We're going beyond it. So I just wanted to understand what's the reasoning for being it okay in the implementation guidance and then not in the recommendation itself.

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PAUL MCGRADY: Thanks, Martina. Hopefully, we'll get a registrar back in the queue that can answer that. Let's move on to Yao, who's been waiting patiently.

YAO AMEVI A. SOSSOU: Thank you, Paul. Good afternoon, good morning, everybody. I wanted to just make a quick comment on the GAC proposal. I think, generally speaking, I appreciate the revised language, and I believe it's appropriately addressing the concern regarding the intermittent or recurring abuse by requiring actionable evidence and demonstrative pattern rather than speculating about the future abuses. You remember during some of our discussion, we were not really aligned about trying to find how we track future abuses, but I think this language, in a way, covers that. And I think my other colleagues from NCSG also are there; I think we could support this. But however, we would like this to ensure that this guideline is understood as addressing the evidence-based thresholds for initiating ADC, not expanding the scope of ADC itself. Like we discussed as well, the ADC up until now, our position as NCSG is that the ADC should be evidence-driven, proportionate, rather than becoming generalized portfolio review. Thank you very much.

PAUL MCGRADY: Thanks, Yao.

YAO AMEVI A. SOSSOU: Thank you.

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PAUL MCGRADY:

All right. Reg?

REG LEVY:

Thanks. Yeah, I wanted to back up Volker's position and say the last time that we saw this, we thought that "is" covers is now, was, and ever shall be, world without end, amen, and didn't require any edits. So the addition of even if it's not active doesn't make a whole lot of sense from the standpoint of how we actually review DNS Abuse. So a non-active domain means it's already been suspended or the abuse has been mitigated. And I understand that the GAC is looking for a way of addressing abuse that may not be imminent, like right in the exact instant, but that goes toward the evidence that they provide rather than toward the actual activity of the domain at the time. So if the abuse has been mitigated by the time we get a report, we do not have actionable abuse, and we should not have to perform an ADC. If there is abuse that points to an ongoing campaign or a campaign that is not yet live on the domain, then that goes toward the evidence that is provided, and so it doesn't make sense to say if the Registered Name is not active at the point of the check, because that says when there's actual evidence that the domain is being used for DNS Abuse, even if the domain is not being used for DNS Abuse. And so it directly contradicts internally. So I just wanted to add a little bit more color to the registrar position based on the offline chat and the others that have chimed in, that this isn't something that we thought was moving forward because this was proposed, and we responded to it, and we thought that the issue was resolved.

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PAUL MCGRADY: Thanks, Reg. So before you go, the language in red in the recommendation itself, from your point of view, should go, but the language of the implementation guidance is okay?

REG LEVY: So we haven't moved on to implementation guidance yet, and I will say, "abuse of the current Registrant" doesn't make any sense, but abuse by the current Registrant does.

PAUL MCGRADY: Yeah. Okay. Yeah. I agree with you. That's the wrong prepositional phrase, but setting that aside, I guess I'm just trying to figure out if the GAC bends on the recommendation language. It's not fun to bend on something only to have the thing you're bending for, the rug pulled out. So, I guess my question for the registrars is if the GAC bends on taking out the red language in the recommendation itself, is the implementation guidance okay?

REG LEVY: So I see these as two independent things, and it's not an "if you get one, do you want the other" kind of situation. But at this time, with the change to by the current Registrant, I think that the registrars can be happy with the red that is proposed for implementation guidance without the red that is proposed for the preliminary recommendation.

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PAUL MCGRADY: All right. I'll take that as a strong a yes as you can give me without saying yes. All right. Farzi, go ahead.

FARZANEH BADII: Hi. So, actually, Yao said everything I wanted to say, and just to reiterate NCSG position. We understand where this change is coming from, and we mentioned last week, but the change should not lead the ADC to start without evidence of DNS Abuse. It should not become speculative, and also it should not become portfolio-wide audit. So these are the principles that we have. And what Reg is saying now, I think we might want to work on a language that can capture not all of these principles, and not in too many words, but can kind of reduce the risk of disproportionate investigation. Thank you.

PAUL MCGRADY: Thanks, Farzi. Matt, go ahead.

MATT THOMAS: Yeah. Matt Thomas with the SSAC. I just wanted to comment on the clarification around the text that Reg was maybe talking around in the red around here. I think it's important for us to be very poignant on what we are talking about a name and what it means to be or not be active. Is it resolving the DNS? Is it a Registered Name? These contexts matter for different purposes, for different security contexts, and I think we need to be very considerate of how we treat any kind of clause around this in that regard. Thanks.

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PAUL MCGRADY: Thanks, Matt. Gabriel, go ahead.

GABRIEL ANDREWS: Hi. I think I don't want to jump ahead yet. I was going to raise an issue with the leadership team's proposed language on the second box, but I'd like to finish conversation about the first box for the GAC language before we move on. And I just want to make sure that that's clear. So let me hold off if there's others to raise ongoing discussion on the first. And to clarify, Reg, I think the implementation guidance is not in the second box, just to be clear. I think I posted that into the chat, but the implementation guidance that we're referring to is not shown on this screen. So they are very much linked topics. So if you want to review the implementation guidance that I just pasted, that's what we're talking about. And if you're comfortable with keeping that language, then that would be good to know.

PAUL MCGRADY: Thanks, Gabriel. Martina, welcome. Okay. I'm not exactly sure. Maybe staff can help me out. We've got implementation guidance in the chat versus on the screen. We want to make sure we know what we're talking about. Pretty sure we're talking about what's on the screen, not in the chat, but also want to be open-minded. Martina, go ahead.

MARTINA BARBERO: Thank you very much, Paul. I don't want to confuse people, but I think what Gabe sent in the chat is the same that you have on the screen, minus the red part. So I think that's where we have an issue with the

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newest red addition in the implementation guidance. But Gabe will explain that. Going back maybe to close the discussion on the recommendation versus implementation guidance. Thank you, Reg, for elaborating on your concern as a registrar. I appreciate it. I think as a GAC, we can drop the suggested language for the recommendation. However, we would be concerned about retouching further the language in implementation guidance to water it down. For instance, I hear you, Farzi, about the concerns about safeguards, but those are included in many other recommendations. And I don't think repeating them here again in this sentence about not having full audit of the entire accounts, this is a discussion that we have, and I think it's relevant in other parts of the report. But here, I think the initial implementation guidance language was already good enough, and we would be keen on finalizing that rather than adding further text that would maybe water that down, and that's something we could live with. But if the implementation guidance is even more imprecise or vague, we would still be feeling a bit uncomfortable with that. So I hope that this is acceptable for the registrars and for all the groups here.

PAUL MCGRADY:

Thank you, Martina. I'd like to thank the GAC for being flexible on this point and for the almost yes I got from the registrars on the implementation guidance. So I think everybody's sort of inching towards each other. I do think we should fix the prepositional phrase "of the current Registrant" to "by the current Registrant." I just think that makes a whole lot more sense. So, that was a good catch. I don't know who caught that, but thank you whoever did. And, yeah. So let's see if

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we can hold that steady in our heads. And then we'll hear again from Gabriel, and then Eberhard. Gabriel.

GABRIEL ANDREWS:

Thank you, Paul, and apologies for not being clear. Martina clarified it. It's early. I just didn't speak well. So moving on to the red text, I wanted to flag an issue that I see with "by the current Registrant." I think this is all going back to a point that Jothan had raised some weeks ago pertaining to when domains might already be mitigated or they might transfer from one registrar to another, and an abuse report might come in, and it was really referring to a time that the domain was used in the past before, after X days or weeks or months, the domain is going to the secondary market. It's bought by someone unrelated, and then it's active again. I don't think that that's well addressed by referring to the registrant, however. So I'm going to propose alternative text of "pertaining to the same abusive scheme and/or abusive actor," because that is what we're talking about. Whereas a single abusive actor, just to give an example in the real world, a single abusive actor might log in with an account and create domains with multiple fictitious registrants. And if you're limiting this to a single registrant, you are looking at registration data as opposed to the actual person who's doing this, the abusive actor, in a way that I think overly constrains what we're attempting to do here. So if I can make that suggestion, I think that that is more appropriate for this stage goal. Over.

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PAUL MCGRADY: Thanks, Gabriel. Can you put that into the chat so you would say instead strike "by the current Registrant" and insert whatever it is you're proposing so we can see it, and then we'll open a queue on whether or not that still makes Jothan and others happy. If it creates new problems, let's try it. Eberhard, go ahead.

GABRIEL ANDREWS: Yes, sir.

EBERHARD LISSE: We had this little discussion in the chat just now. Registered Name, capitalized, is a defined term, if I'm not mistaken. Does that include subdomains? In other words, if somebody registered a name, like I mentioned in the chat, close to nam.gov.na, close to that, and then only deals with subdomains like nampol, something dot, would that fall under this? I'm not sure whether it does. We need to make sure that it doesn't fall out.

PAUL MCGRADY: Thanks, Eberhard. Maybe some folks can talk to the subdomain name issue. Jothan, go ahead.

JOTHAN FRAKES: My apologies. My mute was hidden behind my chat. So I'm hearing Gabe, and I wanted to propose something because I could see some suggestions going in the chat, that after "by the current Registrant," if we added "after confirming this was not" that the... I'm trying to think

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of how to say this. "After confirming they have no relationship with the reported campaign or activity," if that would satisfy the spirit of what's being suggested. Thank you.

PAUL MCGRADY: Thanks, Jothan. Reg.

REG LEVY: Thanks. Abuse that occurs on a subdomain is abuse of the domain. I don't know if that clarifies or answers Eberhard's question.

PAUL MCGRADY: Thanks, Reg. Very clear. Appreciate it. Volker, welcome back.

VOLKER GREIMANN: Yes, and just to expand on what Reg was saying, as registrars, we do not have any control over subdomains, unless they also use our name server setups. But that's a different service. So as registrars, we only control the domain name, and if the domain name is malicious, then that would be proven by the abuse report or an investigation. If it's only a subdomain under a domain name that may be abused, and the domain name itself, there is no conclusive evidence that it's malicious, then that picture might change. We see a lot of subdomain abuse for legitimately used domain names, and I think if we open our discussion to that minefield, then we probably could spend another year. Thank you.

PAUL MCGRADY: Thanks, Volker. Oh, okay. I see a comment here in the chat from Feodora: "Gabe's suggestion for consideration to replace 'by the current Registrant' would be 'pertaining to the same abuse scheme and/or abusive actor.'" And she's re-sharing that in case anybody here can't see it. And I know there's some chat back and forth with Jothan. He is suggesting perhaps adding, I lost it, here we go, "after confirming no relation to the reported campaign" after "by the current Registrant." And so we have two competing options to enhance the red language. Let's keep talking till we get there. Reg, go ahead.

REG LEVY: Yeah. And I get where Jothan is coming from, and we're trying to sever the connection between abuse that was mitigated and then the domain repurchased, and the new use of the domain. So, sorry. Talking this through. Okay. "Reported allegation of DNS Abuse pertaining to the same abuse scheme and/or abusive actor," I think already covers it, because reported allegation of DNS Abuse pertaining to the same abuse scheme and/or by the same abusive actor. "After confirming no relation to the reported campaign," I don't think that's necessary. I think that Gabe's recommendation does resolve that issue. Jothan?

PAUL MCGRADY: Thanks, Reg. Jothan says in chat he's thinking. So let's go to Gabe, and then maybe we can coax Jothan back into the vocal queue. Gabe, go ahead.

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GABRIEL ANDREWS: Yeah. And I'm happy to yield to Jothan if he has an epiphany in the meantime. But actually, I will. I see his hand come up. I'll go after.

PAUL MCGRADY: Perfect. Jothan?

JOTHAN FRAKES: Oh, okay. Yeah, I think what Gabe's proposing would work. I'm not coming at this from a registrar, I'm coming at it really from the SSAC. And the current registrant piece, for me, is a little easier to validate as a third party or from outside the registrar. I think there's opportunities to validate that that had happened versus something that might be opaque to a third-party confirmation or clear evidence. But Gabe, I'm fine with the suggestion that you made. I was looking at it through a different lens, but thank you. Yeah. Thank you for the constructive conversation there, and I'll bow around.

PAUL MCGRADY: Great. Terrific. Thanks, Gabriel. Thanks, Jothan. Reg, thanks for being our peacemaker. And let's quickly move on to the next topic because I think we solved it. I worked for a general counsel when I was a young lawyer in-house, and he would say, "Declare victory and retreat."

So, all right. Pending cannot live with items. IPC noted the definition of reasonably accessible data is placed within implementation guidance. They would prefer it moved up to policy recommendation. The IPC and

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the registrars have been discussing this in the background, and I would like to thank the members of leadership on both sides of that discussion for keeping the conversation going. You know who you are. And today, we are hopefully going to have an IPC update joined with the registrars to let us know where we are. I'm hoping we can hear some of that today. The considerations are implementation guidance is to be used and followed unless org and the IRT determine that the implementation guidance cannot be implemented as proposed. If the IRT decides to not follow the implementation path proposed, implementation guidance path proposed by the working group, they need to provide a rationale. And so implementation guidance is not nothing. I hope that's helpful. We've got Reg has her hand up, and then we're going to go on and see a second slide with more information on this. Reg, go ahead.

REG LEVY: It looks in the chat as though the NPC, sorry, spent too much time playing D&D, the NCSG has issues with the prior topic. So before moving on, I just wanted to give them the opportunity to speak to that.

PAUL MCGRADY: Thanks, Reg. Farzi, go ahead.

FARZANEH BADII: Yeah. So Gabe just reminded us that having the current Registrant here and adding the thing that GAC wants could actually lead to identification of registrant and profiling them. So it does violate our principle. And then he suggested abusive actor or abusive behavior or something like

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that. We have to think about this. So we will talk to NCSG and get back to you. Yeah. Thank you.

PAUL MCGRADY: Thanks. And Farzi, just so that you can capture it, the "of the current Registrant" is coming out and being replaced by what is in the chat. So appreciate you raising your concerns. Hard to follow chat while also doing the vocal thing. So if there are comments all along the way, if you could raise your hand and get in that vocal queue. Not trying to avoid anybody, but chat's hard, especially when you're old and can only do one thing at a time. All right, Michaela, go ahead.

MICHAELA NAKAYAMA SHAPIRO: A short one here. So just to triple-check, the language that's being proposed, that is for the implementation guidance, right? Not necessarily the recommendation up above?

PAUL MCGRADY: Correct.

MICHAELA NAKAYAMA SHAPIRO: Okay, cool. I think still, though, our concern is the same, that that language about the abuse scheme and/or abusive actor, and again, perhaps GAC and/or registrars can come in on this, but my concern here is how are you supposed to ascertain that without perhaps expanding the scope of the ADC to something like a cross-registry or registrar investigation? I guess my concern with the use, and I know we've also

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talked about perhaps not wanting to utilize the term registrant in the scope of this PDP. I think that's been floated around beforehand, so I don't know if the terminology better used here would be something related to the same domain account and/or scheme related to that account, but I will defer to perhaps the lawyers on the call here. Thanks.

PAUL MCGRADY:

Yeah. Thanks, Michaela. So again, the word registrant is coming out, and I'm putting it again here in the chat, "pertaining to the same abuse scheme and/or abusive actor." So based upon what I understand, the NCSG's comments have been all along, this seems to be an evolution in your favor, not the other way. So it would be good to understand the concern of saying abusive actor rather than registrant. And as for the concerns about profiling and cross-registrar investigations, there's just no mechanism here for a cross-registrar mechanism. Everything we've worked on on the ADC checks is about individual registrar responsibility. Someone did propose cross-registrar, and that didn't make it, and that is going on our list of things that we think council should look into, but we've already decided that that's out of scope. And as for the safeguards, they appear all over the place, and putting them into every single recommendation and implementation guidance when all of these are meant to be read collectively is belts, suspenders, and somebody standing behind you holding your pants up, right? We need the language to be readable and usable, so that's why we're not seeing it yet again here. But we did spend an enormous amount of time getting NCSG comfortable that there would be no sort of portfolio-wide hunt for somebody.

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So hopefully we can keep that stable. There's a couple of hands up still, but I think that not to rush things, but we do need to figure out how to finalize these "cannot live with" items that we spent four weeks on. And so let's keep talking, though. I see three hands. Gabriel, Volker, and then Michaela. Gabriel, go ahead.

GABRIEL ANDREWS: Paul, you covered most of my points. I can answer clarifying questions, Michaela, offline if it's helpful, but I'll yield back the clock. Over.

PAUL MCGRADY: All right. Volker.

VOLKER GREIMANN: Yes. So I think the changed language is a great improvement simply because of the fact that it also allows different business models of registrars in. We might not know who holds the account or who is the registrant other than the data that's provided to us, but that might not be the actual data of the actual customer. So if we have the language changed as proposed, I think it allows us to make better determinations and does not focus on one data point. Thank you.

PAUL MCGRADY: Thanks, Volker. All right, Michaela?

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MICHAELA NAKAYAMA SHAPIRO: No, final thought. I appreciate that it's been a lot of moving parts as well. I think largely I appreciate the effort that's been made to ensure that NCSG's positions are integrated there. So I think so far the consensus is that, yes, changing out the registrant from there and the abusive actor, abusive scheme is certainly closer to a position that NCSG can support. We'll just triple-check by going back to our constituency. So thank you.

PAUL MCGRADY: Perfect. All right. Great. Now I'm really declaring victory moving on because we have about 25 minutes for this last one because we do need to get ourselves into introducing the impact assessments, which is the last thing in our agenda. So where were we? We were talking about whether or not reasonably accessible data definition should go into implementation guidance or into the policy recommendation. And we talked about what implementation guidance is. Let's move on to the next screen.

All right. I'm hoping that Marc or somebody from the IPC can jump on and walk us through this screen. Go ahead, Marc.

MARC TRACHTENBERG: Thanks, Paul. I think there's also a section of language missing. Wait. All right. Okay. Yeah. So we, I think, came to agreement with the registrars in our discussions on what the language should include. The question still is whether this language goes into the policy itself or the implementation guidance, and I think we still have not fully reached agreement on this, and so maybe we can today. Basically, the position

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of the IPC and the BC, they also support us on this, is that we kind of can't even believe we're having this discussion because it kind of feels like we're being gaslit. I mean, are we really saying that it's controversial that the policy include that basic domain registration data that registrars are required to collect is reasonably accessible to them and is a baseline for what could, and again, what could and not even what must be looked at for the ADC, and that registrars are responsible for their resellers? I mean, do we really think that this is something that the council and the board could not support? We've bent over backwards in the recommendations to make clear that registrars have discretion to choose what data points they can rely on in the ADC, but we can't agree on this baseline of data in the ADC that the registrars could choose from? I mean, I think if that's the case, then there's little hope that what we're going to end up with will be meaningful, and we might as well stop and give people hours back in their week.

PAUL MCGRADY:

Yeah. Marc, I'm sorry, I don't mean to interrupt you, but it seems like you've jumped to argumentation about something you've not presented. Would you like to present this chart, or would you like for me to do it, and then we can get to argumentation?

MARC TRACHTENBERG:

Okay. Sure. I mean, I'm happy to read it. So "reasonably accessible data" means Registration Data, which is a defined term, or other information searchable and available to the registrar through its own existing systems and processes in the normal course of business. The availability

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of data beyond Registration Data may vary based on the registrar's business model, operational structure, and data architecture. Registrars are not required to obtain, compile, create, or access data that is not ordinarily available to them, would require disproportionate effort to obtain, or where doing so would violate applicable law or contractual obligations. For the purposes of this policy, "reasonably accessible data" may include, but is not limited to, Registration Data, again, the defined term, required to be collected or maintained under applicable ICANN agreement and consensus policies; data otherwise held by the registrar and reasonably accessible through systems and processes used in the registrar's normal course of operations; and information received by the registrar in connection with an abuse report or investigation. Where a registrar operates through a reseller or similar business model, a registrar may rely on a reseller to conduct ADC investigation steps using data reasonably available to the reseller. Registrars will remain responsible for all relevant contractual obligations as required by 3.12 of the RAA. This means the registrar is fully responsible for complying with all RAA requirements, including 3.18, even when it uses a reseller.

PAUL MCGRADY:

Great. Thank you, Marc. And this is proposed language from the IPC. Let's set aside the issue of should this be in a definition or should this be in implementation guidance for the moment, and let's open a queue on the text itself. Any concerns with the text itself, regardless of where it goes? And we have Volker and Reg. Volker, go ahead.

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VOLKER GREIMANN: Yeah, I'll be brief. Just for the last sentence, I think this can go in its entirety. It just restates what's already in the RAA. I don't think we need to restate language that's already contractually required. That makes no sense, adds nothing, and just muddies the water. Thank you.

PAUL MCGRADY: Thanks, Volker. So Volker's suggesting taking out the last bullet. Reg, go ahead.

REG LEVY: Thanks. Yeah. So the Registrar Stakeholder Group met with the IPC, and we both agreed to come back with new language. The registrars proposed some new language. We went back and forth a little bit, and the majority of this that you see on the screen is registrar-suggested language to accommodate the IPC's concerns. I agree that the last point is unnecessary, but this is language that the two of us came together to present. We still, however, think that this belongs in implementation guidance.

PAUL MCGRADY: All right. So we have essentially the registrars saying this language is okay with them except for the last bullet point.

REG LEVY: Not just okay with, but proposed by.

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- PAUL MCGRADY: Proposed by the registrars. Co-proposed by the registrars and the IPC, except for the last bullet point. I know we've talked about that last bullet point together as a group. Yes, it may be redundant, but for some who wanted to see that for comfort, maybe they can get back in the queue. Brian, go ahead.
- BRIAN CIMBOLIC: Thanks, Paul. And thanks to the registrars and the IPC for working on this together. I have a question. I guess it's mostly for the registrars. If from a substantive perspective you're okay with the language, just, and I apologize, this is my first real PDP, so I'm not an expert on the significance of what's in the recommendations versus what's in the implementation guidance. But if you're okay with the substance of this, can you walk me through what's the issue if this were to be included in the actual policy language? What's the downside you're trying to protect against in having it be only in implementation guidance versus in the policy?
- PAUL MCGRADY: Yeah. Thanks, Brian. We will get to that, I promise. Anybody else that has any comments on this text, or can we consider the text other than the last bullet point stable? Volker.
- VOLKER GREIMANN: Yeah. To delve a little bit deeper on my previous comments, I think how a registrar may employ resellers and how it must regulate and can share responsibilities with resellers is very much not part of this PDP. I think it
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is either part of another PDP or of the contracts. I think that's for the future to decide. And just taking out one small bit and saying, "This has to be handled this way," or, "It can be handled this way," basically makes it more difficult to change the RAA down the road. I think we should stick to the ADCs, not how we regulate our businesses with resellers. I don't think it adds much, and it can provide a stumbling block down the road to those that want to do good here.

PAUL MCGRADY: Thanks, Volker. All right, any other comments on the language? Marc.

MARC TRACHTENBERG: Would it make it better, that last point, to just say then that registrars will remain responsible for compliance with the policy?

PAUL MCGRADY: I think Marc said, "Would it make it better if that bullet point just said registrars will remain responsible for compliance with this policy?" Marc, you're kind of muffled, but I think that's what you said.

MARC TRACHTENBERG: Correct. Sorry. Sorry if I was muffled. That's what I said.

PAUL MCGRADY: Yep. Volker, does that do it for you?

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VOLKER GREIMANN:

Actually, no, because we are already responsible for complying with consensus policy. That's basically one of the first and foremost obligations of the RAA. So, just stating that we have to comply with this policy specifically, where we already have to comply with all policy, I don't think that does anything. I'd rather not have superfluous language in there. Let's be as targeted as possible. Thank you.

PAUL MCGRADY:

Thanks, Volker. Thanks, Marc. And I see in the chat, "Do IP lawyers get muffled mics on purpose?" Yeah. Plausible deniability later, right? Actually, Farzi, I bought this new microphone and speaker just for you because my microphone is so terrible on my laptop. So, you cost me \$49.95, but you're my favorite working group member, so it was worth it.

All right. So let's put a pin in that last bullet. Now, we've got another, I don't know, 10, 12 minutes or so. Let's ask the big question that Brian wanted to ask earlier, which is, assume this is now stable language except for the last bullet point. Does this need to go into the recommendation itself, or is implementation guidance sufficient? And let's go back one screen, and I'm not trying to put my thumb on the scale, but I do want everybody to hold in their heads the status of implementation guidance. Implementation guidance is to be used and followed unless the org and the IRT determine that the implementation guidance cannot be implemented as proposed. If the IRT decides not to follow the implementation guidance path proposed by the working group, they need to provide a rationale. See the initial report structure and what language should be placed where.

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Okay, great. So let's go back, and let's start that queue. And this is in our "cannot live with" items, and so we're taking it seriously. This is one that the IPC has said they can't live without this change, which is a credible threat to the entire work we've all been doing. So let's take it seriously. Let's do a queue. And let's say where you would like this, either in the recommendation or in the implementation guidance, and why. Why does this matter? And let's start that queue. Okay. Reg, thanks for kicking us off. It's almost philosophical at this point, so please go ahead.

REG LEVY: Talk to us. So for the first piece of my argument, I'd like to say that my understanding was that this was in implementation guidance. So the argument should be why it should move rather than why it should stay.

PAUL MCGRADY: Yes. I think that's right.

REG LEVY: That said, we think it should not move because, as you indicated on the previous or possibly the following slide, that means that it cannot be deviated from. Registration Data may not be easily searchable, and what we do not want is for the Implementation Review Team to come up with an implementation policy that says you have to search by registrant, for example. Because we don't actually conduct ADCs that way. Usually, registrant is the least relevant piece of a domain registration when we're reviewing it. And so we think that it's reasonable to include this in the implementation guidance, but not in

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policy, because we do not think it is reasonable to expect us to search by registrant in all or even any of the cases.

PAUL MCGRADY:

Thanks, Reg. Yes, and that goes back to initial first principles of why this was in the implementation guidance because you all may recall in the very early days, we talked about not putting things that would calcify into the recommendations because that would make our policy age, and force us into a new policy development process. And so that's why it is in the implementation guidance, but the IPC wants it out. And so you're right. That's what we're talking about. But it is a deviation from everything else that we've done because if you notice, these kinds of definitions are not in the recommendations. But the IPC wants it, so we're giving it their time, and we'll see where we get. Lawrence.

LAWRENCE OLAWALE-ROBERTS:

Thank you. Thank you, Paul. So I would make an attempt to touch on the previous question and now on this current one. With regards to the language that had to do with resellers, more or less, resellers are usually a different entity from the registrar, and if the registrar, based on their business model, might decide that the ADC be conducted by the reseller, they would eventually also have to own that process or own the outcome of that process. And this last clause therefore gives a lot of comfort in reaffirming that even if ADCs are conducted by the resellers, the results will be seen to have been submitted by the registrar.

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Now, going to the current state of discourse. Yes, this is now in implementation guidance. But the BC basically believes, to a large extent, that this forms the crux of why we are even having this ADC in the initial instance, trying to create a policy around it. And if there is any part of the policy development that shouldn't be open to interpretation or further interpretation, this will be one of those aspects of it. For that reason alone, we would like to see this moved from implementation guidance to the actual policy language itself, wherein whatever four or five years down the line, we'll still have to reference the fact that this is an important identity that has to be considered. Thank you.

PAUL MCGRADY:

Thanks, Lawrence. And again, on the last bullet point, we've put a pin in it, but there is a history to this bullet point. We talked about this extensively at ICANN86, and that concept of stating affirmatively the registrars being on the hook for reseller behavior was hard-fought. And so that was kind of stable, and now Volker's asked for it to be unstable. And so we'll see where we get, but I'm resistant to reopening that up, unless there's some new compelling argument that we didn't cover in ICANN86. But I hear you on that. And thank you for your comments on why this should be moved up to the recommendation and not just implementation guidance. Marc, you're up. Go ahead.

MARC TRACHTENBERG:

Sure, and hopefully I'm clearer now. I agree with Lawrence's comments, and I think with respect to where this language sits, we've been arguing to move this for a while, and I think where it originally ended up in the

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implementation guidance is partially a result of not everyone understanding what that significance was. But that aside, I don't get it. Are we really saying that it's controversial that the policy includes that basic domain Registration Data that registrars are required to collect is reasonably accessible to them? And again, it's just a baseline for what could and not even what must be looked at for the ADC. This is just table stakes. And to Reg's concern, I just don't see how the IRT could decide that registrars must search by registrant, because the recommendations clearly state that the registrar can choose. And so I don't see any risk to doing this. This is basic stuff that should be in the policy that I can't see how any IRT would have to interpret differently, and I can't see how the council or the board cannot get behind this. And again, it's just table stakes. If we can't even include basic Registration Data and what can be considered the ADC, then I'm like, "What are we doing here?"

PAUL MCGRADY:

Thanks, Marc. We have Volker, then Ching. Volker?

VOLKER GREIMANN:

Yeah, what are we doing here, indeed? Let's remember what "cannot live with" means. "Cannot live with" means that you, that are proposing to move this, are saying that you'd rather have no policy than a policy where this is in implementation guidance. That is what you are essentially saying. Okay. We can accommodate that. We don't want to have that, but we can walk away, meet again in a year, see where this is going. If you change your minds, then we'll talk about that. I also dislike

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your comment about table stakes. Table stakes is something where, in a game of poker, everybody antes up, and then you get to sit at the table. What have you anted up? At this point, table stakes means registrars only. That's not the right term then. That is just a demand from IPC for registrars to give something that IPC is not willing to put up themselves or anything equivalent to that. I hate that word in this context, and I don't think it makes sense in this context. Let's focus on what we have. We have a policy that can be implemented in short order, or the IPC can choose to walk away. That is the option. Thank you.

PAUL MCGRADY:

Thanks, Volker. Because Volker was talking to Marc rather than to the text, let's have Marc pop in here ahead of Ching. I hope that's okay, Ching. Marc, go ahead.

MARC TRACHTENBERG:

Sure. I guess in response, I would say that we didn't create this "cannot live with" framework. We're just dealing with it as it was handed to us, and we're not saying that we want to walk away from this. And even if we did, it wouldn't matter. This policy would still continue. As Paul made clear, everyone can't agree with everything. So it's not like we have the ability to blow up this policy anyway. But I think what we're saying is that without this even baseline requirement in the policy, it's not even a requirement. Without this baseline set of information that could be considered, we don't think this policy is likely to be meaningful. And you say we can have this policy in short order. It's not going to be implemented. It's got to go to the IRT and council and everything else.

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It's not going to be short order anyway. This is going to go on for a couple of years. But it doesn't make sense to just end up with something that can go through in short order, whatever short order is, if the policy is not going to be meaningful. And without this baseline stuff, we just don't think it will be meaningful, and so that's our position.

PAUL MCGRADY: Thanks, Marc. Okay, Ching, go ahead.

CHING CHIAO: Thank you, Paul. Ching for the BC. Very quickly, so I think one registrar and potentially Reg are trying to frame the Registration Data simply to the registrant, so I think this is a very dangerous way to concentrate the dialogue here. So I guess what we are proposing here, because registrars have those accessible data through the registration process that you collect. So we're not single-pointing the registrant data. We're saying, and also in the real-world practice today and the foreseeable future, other data elements than the registrant data will be used. So I'm seeing that, for example, ICANN Compliance will not ask you to singly point it out if the ADC needs to use the registrant data, but simply ask the registrar to say, how do you actually use the reasonably accessible data to conduct your ADC? So it's very dangerous just to frame registrant data here. Thank you.

PAUL MCGRADY: Thanks, Ching. All right. Reg, go ahead.

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REG LEVY: So I heard Marc say that this wasn't "cannot live with," which is good to hear, and I also heard Ching say that Registration Data isn't registrant data. But Registration Data is a defined term that refers to data collected about the RNH. It's WHOIS data. So I'm not sure what Ching thinks Registration Data means.

CHING CHIAO: Can I answer a little bit, Paul?

PAUL MCGRADY: Sure, Ching. Yeah. Go ahead.

CHING CHIAO: Thank you, Paul. So just to make it clear, I understand the definition of Registration Data. I just feel it's dangerous just to frame the dialogue in the conversation simply to the registrant data here. Thank you.

PAUL MCGRADY: Reg, go ahead.

REG LEVY: We agree.

PAUL MCGRADY: All right. Yay.

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REG LEVY: Yeah. We think it should be way broader, and that's why it's "may," and also why it should not be in policy.

PAUL MCGRADY: All right. Last call on this. We didn't have a kumbaya moment, but at least we know the universe of what remains out there. Going once. All right.

REG LEVY: All right. What's going?

PAUL MCGRADY: What's going? We are moving off this topic and into our next thing on our impact assessment checks. Marc, go ahead.

MARC TRACHTENBERG: Just for clarity, I think I'm asking the same question that Reg was asking. When we say we're moving off this, basically where we end up is that this language ends up in implementation guidance?

PAUL MCGRADY: So, Marc. Yeah, Marc, I don't know yet, frankly. What we did accomplish on the slides is that the language is stable except for the objection to the last bullet point, although the objection to the last bullet point, we've had that conversation, and getting that comfort on the reseller issue was hard-fought. So that's got a pin in it. We heard from the IPC and the BC their arguments for why this needs to be in, or should be in,

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the recommendation language rather than the implementation guidance. We heard from others having the opposite view. We heard the IPC downgrade this from a "cannot live with," walk away, no policy to something else that we've not defined yet. So the answer is, I don't know. I need to get together with Nick and figure out where we are. And let me see if we can come up with a way to get everybody as close to happy as we can. If I need to sort of make a chair call right now, I don't know where I would call that, right? But I don't think I need to. I just think we need some time to think about where we are and have us come back to everybody. Marc, go ahead.

MARC TRACHTENBERG:

Yes, I would just add quickly that a suggestion was made by Michael Graham, I think, on the list of putting this into definitions. And so maybe that's a solution to the extent that the definitions are part of the policy, but maybe that doesn't address the registrar concern. So just throwing that out there for consideration.

PAUL MCGRADY:

All right. Thanks, Marc. All right. Great. Okay. Let's move on then to the update and next steps on impact assessments. We did share the scoped impact assessments, originally shared the scoped IAs on data protection and human rights with the working group for review. We've had no further feedback received on those so far, so that's good. Seems like staff got it right. Now we need to work on the final impact assessments. Once the working group has stable recommendations and all charter questions answered, then we complete the impact assessments on HR,

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DP, GPI, and consensus policies. And the draft initial report shared with the working group will be based on the draft initial report shared with the working group on June 30th. And leadership with support staff, we started looking into pending impact assessments to share with the working group for your review. These are what we've accomplished. So we are providing initial information and considerations on the overall scoped impact assessment; a more comprehensive look at the human rights issues; the GPI issue considerations; data privacy considerations. Oh, and for those, I'm sorry, jargon. Global public interest, GPI considerations; data privacy considerations; and then the impact on other preexisting consensus policies. We looked into the working group deliberations, and what inputs we had on the scoped impact assessments for human rights and data privacy. And that's how we ended up with the initial draft of the comprehensive impact assessments document for everybody to look at. Our goal as a leadership team is to provide a nuanced impact assessment, noting the working group took everything into consideration as we were working through the recommendations.

So that's a whole lot of setup. High level overview on human rights consideration. These are based upon consideration and working group discussions on potential impacts on human rights, such as due process and how the working group has taken those into consideration during its deliberations. Those have a lot to do with the safeguards that we spent a lot of time on with NCSG. Global public interest. The overall seemingly positive impact on the global public interest. That's what we're trying to do, right? We're trying to come up with a policy that advances the public interest, not hurts it. And we did also consider

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potential negative impacts on rights. Those two things kind of, both one and two, are not fully independent of each other. Data protection considerations: this talks about the potential data privacy impact and how the working group deliberations and preliminary recommendations aim to minimize those. Again, the NCSG spoke a lot into that in terms of not having portfolio-wide searches. The registrars spoke into that in terms of not having to create a bunch of new documents and reports and historic abuse and data and all this other stuff that we've all agreed should not happen. And then the impact on consensus policy considerations. As far as the leadership team can tell, there's minimal to no apparent impact on existing consensus policy, and that this is likely to fit right in as its own consensus policy.

So, that's kind of where we landed. Essentially, the first three are the history of how we got here, and the last one is what we think the effect will be. So, shortly, hopefully not too long after this call, but certainly not more than a day or so, we are... Oh, is it done, Feodora? Did you put it into the link? Is there a link? Wonderful. Yes.

FEODORA HAMZA:

Hi, Paul. Yes. Hi. We shared it last week with the group.

PAUL MCGRADY:

Oh, okay. Well, I should read my own emails then.

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FEODORA HAMZA: No problem. As we discussed, we shared it last week, but we noted that it was a public holiday, so there will be time to review. And shared in the chat as well.

PAUL MCGRADY: Got it. Okay. So everybody's had it for a couple of days, but if your last couple of days were like my last couple of days, you didn't do anything with it. I hope, especially for the Americans, that 4th of July holiday is, for me, one of my favorites and a personal workflow disaster. And so anyways, everybody grab that link. We need for you guys to go in, and I know we're giving you two big homework assignments at the same time, which is continue to look at the preliminary draft recommendations and get comments on those, especially the NCSG who promised us they're coming, but everybody. And also please take a look at this draft of comprehensive impact assessment. And last week, Feodora showed me how to do comments. You can do comments directly into it, and so that's how we should do it so that we can capture everybody's thoughts on that. It's an Excel document, five sheets covering each impact assessment individually, and providing references and instructions. What did we miss? Right. If there's something missing, please call it out. If something, in your view, has been not correctly characterized, please call that out. What's in here that shouldn't be from your point of view? And again, please provide the comments directly into the document where they go so that staff can grab those and we can evolve the document. This is very much a living document that needs to be evolved, and so please dig in, everybody. And I'm going to call on Farzi. Farzi, go ahead.

FARZANEH BADII:

Thank you, Paul. I just wanted to congratulate ICANN staff for drafting a great human rights impact assessment. I do this as some part of my day job, and it's been done professionally and with care in regards to everyone's concerns. Of course, we are not going to go without making comments on the language. But overall, I think that it's a great first attempt, and I think that ICANN can be exemplary in this field of human rights impact assessment if we continue doing the work so diligently as the staff are leading.

A few things that when I was looking at, especially when we are talking about this IPC request and data protection impact assessment, so these are interrelated issues. If we agree on the language, although the impact assessment might not go into these granularities, but when we are discussing issues that could have an impact on data protection, then it would be good to, and as you say, it's a living document, so it would be good to consider what sort of data protection impact our requests have and let the staff at least capture them, because data protection impact assessment is about impacts and mitigation. So, it doesn't mean that we are going to disregard the comment if the data protection impact assessment is not that positive. But, I think that I didn't look at the global public interest framework, but overall, I congratulate the staff. It's neutral, it's comprehensive, it's great.

PAUL MCGRADY:

Thanks, Farzi. That's great. I agree entirely. Staff did a great job. When Nick and I walked through it with them, we had very few comments on

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it. And so I'm glad that you had a chance to eyeball at least most of it, parts of it, and we appreciate the feedback on that. And yes, it's a living document, and it will continue to live and evolve until we're done, right? Because we are going to put out our preliminary report for public comment, and we're going to read those and take them seriously. And so we may have changes between the preliminary report and the final report. And if we have changes to recommendation languages or implementation guidance as a result of public comment, then this document may need to evolve because our positions evolved, right? So, in other words, we're not done until we're done. But I think, Farzi, thank you, and I think staff did a great job, and I think this is, I think, going to go real well. So, great. Any other preliminary comments other than Paul, "You should read your own emails on Fridays"? Gabriel, go ahead.

GABRIEL ANDREWS:

Yeah, just a quick admin one. I was just typing into chat, but I'll say it out loud, too. Is it possible to get these new documents into the Confluence wiki under Section 5 for working group documents? Just to kind of keep in a centralized place. I maybe am very bad at this compared to others, but I constantly am losing the appropriate links or the emails that have attachments. Over.

PAUL MCGRADY:

Yeah. Thanks, Gabriel. Yeah. I'm sure staff will be happy to do that, so thank you, staff, in advance for grabbing those. I have the advantage of a... What's it called? Anyways, one of those tools where staff helps me keep things better organized. But I think, yeah. John says, yes, we will

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get them posted in the wiki. Slack. That was the word I was trying to come up with on July 6th. It's the worst Monday of the year. Okay. Any other comments on this?

All right. I think that takes us to next steps. So, homework assignments for everybody. Staff will update the preliminary recommendations and draft initial report based upon the discussion today. I think the leadership team usually meets with staff on Thursday. We are going to spend some real time on these last issues and see if there is some way to get us all on the same page. So stay tuned. If everybody could keep reviewing, provide a second round of comments on the draft initial report by July 9th. That's three more days. That would help us be able to talk about all of it holistically on Thursday. So we would appreciate anything you can do to accelerate the review of that. Then the next piece of homework is for everybody to look at the draft impact assessments and provide comments and feedback by July 13th. Sounds like we're on a good path, but there's always ways to improve and evolve, so please do. And our next meeting is July 13th at our usual time, I believe. I think that's it. Anybody have any AOB?

All right. I would like to thank everybody for the demeanor on the call today. I know this is brass tacks stuff. And everybody, I thought we did a good job of getting as far as we could. And we will keep at it, and I will talk to you all in a week, but I'm looking forward to reading the comments. All right. Thanks. Have a great week, everybody. Bye-bye.

**[END OF TRANSCRIPTION]**