

SAC104

SSAC Comment on Initial Report of the Temporary
Specification for gTLD Registration Data Expedited Policy
Development Process

Preface

This is a comment to the ICANN Generic Names Supporting Organization from the ICANN Security and Stability Advisory Committee (SSAC) about its initial report of the temporary specification for gTLD registration data expedited policy development process.

The SSAC focuses on matters relating to the security and integrity of the Internet's naming and address allocation systems. This includes operational matters (e.g., pertaining to the correct and reliable operation of the root zone publication system), administrative matters (e.g., pertaining to address allocation and Internet number assignment), and registration matters (e.g., pertaining to registry and registrar services). SSAC engages in ongoing threat assessment and risk analysis of the Internet naming and address allocation services to assess where the principal threats to stability and security lie, and advises the ICANN community accordingly. The SSAC has no authority to regulate, enforce, or adjudicate. Those functions belong to other parties, and the advice offered here should be evaluated on its merits.

Table of Contents

- Preface** 1
- Table of Contents** 2
- 1 Introduction** 2
- 2 Overarching Comments** 3
 - 2.1 Timing and Future GNSO Policy-Making Process 3
 - 2.2 Legal Advice 4
 - 2.3 Level of Consensus 4
 - 2.4 Data Flows/Responsibilities of Parties 5
 - 2.5 Reduction of Contactability and Manageability 5
 - 2.6 Risks and Costs 5
- 3 Comments on Specific Sections of the Report** 6
 - 3.1 EPDP Team Preliminary Rec #1 6
 - 3.2 EPDP Team Preliminary Rec #3 6
 - 3.3 EPDP Team Preliminary Rec #4 7
 - 3.4 Section 3, Part 1: Purposes for Processing Registration Data: Recommendation #2: Standardized Access: 8
 - 3.5 EPDP Team Preliminary Rec #7 9
 - 3.6 EPDP Team Preliminary Rec #11 / Question #7 for community input 9
 - 3.7 EPDP Team Preliminary Rec #12 / Question #8 for community input 10
- 4. Acknowledgments, Statements of Interests, and Objections and Withdrawals** 11
 - 4.1 Acknowledgments 11
 - 4.2 Statements of Interest 12
 - 4.3 Objections and Withdrawals 12

1 Introduction

On 21 November 2018, ICANN opened a public comment proceeding to obtain input on the Initial Report of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process (EPDP).¹ The initial report outlined the core issue discussed, proposed responses to its charter questions² as well as twenty-two preliminary recommendations.

The SSAC welcomes this opportunity to provide input. We thank the EPDP team for its hard work in delivering such a substantive report. Our comments are organized as follows: In section 2, the SSAC made several overarching comments to the report. In section 3, the SSAC commented on specific sections of the report.

A new mandatory mechanism for collecting public comment was implemented for the purpose of this EPDP: an online poll that asks respondents specific questions about each recommendation in the report. This was meant to provide easy collation of responses from the public. The SSAC has submitted feedback through the form. However, we have found that the form limited our ability to provide comment.³ The SSAC therefore asks that the EPDP members consider comments in this document, and we would like your assurance that the below will be taken into account and incorporated into the Final Report as appropriate.

2 Overarching Comments

2.1 Timing and Future GNSO Policy-Making Process

The EPDP has made good progress, but will clearly not complete sections of its charter.⁴ The EPDP team must submit a revised report to the GNSO in a few weeks, after which the EPDP WG's substantive work will end. The SSAC urges the GNSO to begin planning further efforts now, to complete the policy-making that has been started.

It is vital to keep momentum. Driven by the GDPR, the EPDP is finally addressing some long-delayed issues.⁵ It will not serve the Internet community, or ICANN as a multistakeholder organization, if the work is allowed to drift. We urge the GNSO to begin planning next steps,

¹ <https://gns0.icann.org/sites/default/files/file/field-file-attach/epdp-gtld-registration-data-specs-initial-21nov18-en.pdf>

² see <https://gns0.icann.org/sites/default/files/file/field-file-attach/temp-spec-gtld-rd-epdp-19jul18-en.pdf>.

³ The new comment mechanism only allowed a *predetermined subset of feedback, limited by what questions were asked and how they were asked*. The form was ill-suited for providing feedback about higher-level issues, or about topics found only in the body of the report. We also have comments relevant to specific recommendations but found that our comments did not line up with any of the specific question/response fields. Ultimately we feel that this experiment was not entirely successful and is not yet refined enough to be used as a model for ICANN public comments.

⁴ Several charter topics have not been discussed yet; others have been touched upon but not completed. These include but are not limited to discussions of data accuracy, Standardized Access to Non-Public Registration Data, data retention, and necessary updates to other Consensus Policies. For example it is unclear if a revised Temporary Specification will allow the thin-to-thick migration of .COM, .NET, and .JOBS per the Thick WHOIS Consensus Policy and ICANN Board Resolution 2014.02.07.08. In another example, the implementation of the cross-field validation requirements in the RAA remain stalled due to GDPR concerns:

<https://www.icann.org/en/system/files/correspondence/namazi-to-bunton-06nov18-en.pdf>

⁵ See SAC101v2: "SSAC Advisory Regarding Access to Domain Name Registration Data," Recommendation 1 Available at <<https://www.icann.org/en/system/files/files/sac-101-v2-en.pdf>>

with specific deliverables and ambitious deadlines for completion. This includes deadlines for any implementation projects that come out of the present EPDP.

2.2 Legal Advice

The EPDP has been largely about legal issues, but the EPDP team has not had access to neutral, expert, outside legal advice. This is a notable omission given the consequences and regulatory complexity of the work. The SSAC urges the GNSO Council to re-examine this as further policy-making takes place in 2019 and beyond. This subject is a worthy place to spend ICANN budget given the priority and nature of the work, and a place to apply all the professional tools at ICANN's disposal, in order to carry out ICANN's responsibility to ensure the stable and secure operation of the Internet's unique identifier systems.

The EPDP relied upon the expertise of its members, a minority of whom had professional legal backgrounds. While the members did credible work, neutral legal advice would provide substantial benefit by fostering common understandings, consensus, and confidence in the deliberations and work product. In particular, it may help policy-makers understand the options available to them, given that bodies such as the European Data Protection Board and the national data commissioners are not in a position to answer many questions or evaluate policy proposals.

Not every aspect of the work needs legal advice. If managed judiciously, legal advice could make the work easier, and be kept within a budget. There was past success with this approach during the IANA transition work, where external legal advice was obtained.

2.3 Level of Consensus

The GNSO PDP Manual and the GNSO Operating Procedures⁶ state that Initial and Final Reports should contain "Statement[s] of level of consensus for the recommendations presented" and related supporting material. The Initial Report is missing this information, which must be present in the Final Report. Consensus-level information is essential so that the community, the GNSO Council, and the ICANN Board can understand the Working Group's deliberations and understand the areas of agreement and divergence.

The following are required by GNSO Operating Procedures:

- "Each recommendation in the Final Report should be accompanied by the appropriate consensus level designation" (p. 73), per the "Standard Methodology for Making Decisions" (p. 53).
- "In cases of Consensus, Strong support but significant opposition, and No Consensus, an effort should be made to document that variance in viewpoint and to present any Minority View recommendations that may have been made. Documentation of Minority View recommendations normally depends on text offered by the proponent(s). In all cases of Divergence, the WG Chair should encourage the submission of minority viewpoint(s)." (p. 54) The Initial Report contains documentation about divergent opinions and policy options in some cases but not others.

⁶ *PDP Manual*, page 6: <https://gns0.icann.org/sites/default/files/file/field-file-attach/annex-2-pdp-manual-18jun18-en.pdf>, and *GNSO Operating Procedures*, page 73: <https://gns0.icann.org/sites/default/files/file/field-file-attach/op-procedures-18jun18-en.pdf> The importance of the procedures in these documents is stated in the ICANN Bylaws, Section 13(d), and Appendix A, Sections 2 and 6. 1.

SSAC Comment on Initial Report of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process

- "It is the role of the Chair to designate which level of consensus is reached and announce this designation to the Working Group. Member(s) of the Working Group should be able to challenge the designation of the Chair as part of the Working Group discussion." (p. 55)

The EPDP Charter⁷ provides additional guidance about how the "consensus calls" (assessments of consensus) should take place.

2.4 Data Flows/Responsibilities of Parties

The report does not provide a clear view of data flows and which parties are deemed responsible for various types of processing. There have been several discussions and questions raised within the EPDP on topics of what type of controller each party is in each role. It would be very helpful to evaluate proposed policy with a clear mapping of the roles, responsibilities, and data flows.

2.5 Reduction of Contactability and Manageability

A fundamental reason for providing an RDDS is to enable efficient communications between parties with legitimate interests and purposes to interact with the appropriate party regarding the allocation of domain names and the functioning of the DNS.

The pre-existing system included contact roles for specific purposes, yet the report indicates that some of these will be deprecated, and that providing the ability to process contact object data may place additional burdens on contracted parties. It should be clear that there are no "new" requirements to address, but rather, compliance with the law regarding existing requirements.

The EPDP Working Group's recommendations move away from the model of "purpose-based contacts" that has had wide support in prior work (e.g., WHOIS Expert Working Group⁸). Such a move will interfere with established, efficient operations that will affect the security, stability and resiliency of the DNS, and will affect the management of domains by potentially millions of registrants. We recommend that the EPDP look at this issue holistically and review how decisions to address one set of concerns may affect others, and more importantly, the workings of the entire ecosystem.

2.6 Risks and Costs

Risk and cost are sometimes conflated in the EPDP discussions. Risk can be mitigated by adopting additional procedures, which may have an associated cost. Such costs may be reasonable given that the law imposes the new requirements, and given the legitimate needs involved.

The GDPR imposes certain new obligations and therefore risk and costs on registrars and registry operators. It has also imposed risk and costs on the parties who rely upon domain registration data for the wide array of legitimate purposes.

⁷ Charter, pages. 12-14. <https://gnso.icann.org/sites/default/files/file/field-file-attach/temp-spec-gtld-rd-epdp-19jul18-en.pdf>

⁸ see <https://www.icann.org/en/system/files/files/final-report-06jun14-en.pdf>.

SSAC Comment on Initial Report of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process

The GDPR calls for balancing and the accommodation of legitimate security interests, explicitly called out in Recital 49. ICANN policy should also provide balanced solutions.

In some cases the Initial Report asks what costs will be borne by the Contracted Parties, but does not also evaluate the costs on all other parties, or the cost of *not* putting a balanced solution into place. Cost or risk to registrars or registry operators alone is not a persuasive argument against balanced solutions.

3 Comments on Specific Sections of the Report

3.1 EPDP Team Preliminary Rec #1

Purpose 3 says: “Enable communication with and/or notification to the Registered Name Holder and/or their delegated agents of technical and/or administrative issues with a Registered Name.”

This wording conflicts with Recommendation 4, which would do away with Administrative and Technical Contacts. See comments above, and on Recommendation 4 below.

A view has been expressed that compliance with policy will require additional work, such as the distinction between legal and natural persons. This requirement arises from new legislation and should not be used as a means to weaken existing policy or enforcement thereof.

3.2 EPDP Team Preliminary Rec #3

Recommendation 3 says: “The EPDP Team recommends that requirements related to the accuracy of registration data under the current ICANN contracts and consensus policies shall not be affected by this policy.”

The EPDP was chartered to determine if the Temporary Specification complies "with the GDPR and other relevant privacy and data protection law." GDPR principle 1(d) requires that “Personal Data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’).”

It is not logical to examine if only some ICANN policies comply with GDPR but to not examine others. Here the EPDP WP makes a recommendation about data accuracy, but so far the EPDP team has not fully explored the data accuracy requirements of the GDPR, and whether the procedures in the 2013 Registrar Accreditation Agreement (RAA) and the Temp Spec are GDPR-compliant. That needs to be done.

ICANN has several requirements about registration data accuracy. SSAC believes that data accuracy in RDS is vital, and has commented many times on the importance of accuracy in RDS data.⁹ A vital ICANN policy is the accuracy complaint process, where third parties have the right to submit data accuracy complaints, and registrars and registrants must respond per the requirements. The accuracy complaint process has been a vital accountability and compliance mechanism. Indeed, registration data inaccuracy complaints have come mainly from the public, who are for example affected by abusive registrations and bad actors who provide bogus data. But the ability of third parties to see the data, and therefore to make complaints, has been greatly

⁹ See SAC027, SAC055, SAC058, SAC061, and SAC101, at <https://www.icann.org/groups/ssac/documents>

SSAC Comment on Initial Report of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process

curtailed by the GDPR and the Temp Spec. As a result, the number of WHOIS inaccuracy complaints to ICANN has fallen by 40% in a short time.¹⁰ Accuracy requirements and procedures without the opportunity to use them are worthless.

A balanced situation is needed. An accredited RDS access program will allow examination of the data and challenges by parties who are pre-qualified and responsible actors, and some better requirements around reasonable access would assist non-accredited parties and would also be part of a balanced solution. Please see our notes regarding Preliminary Rec #12 / Question #8 for community input below.

This situation also makes it more important for ICANN Compliance—which can request the data for examination--to perform accuracy checks going forward.

3.3 EPDP Team Preliminary Rec #4

The proposal for “Tech Fields” has two major problems. First, it allows registrars to choose whether to even give registrants the option of providing a technical contact. That will harm contactability, effectively reducing the ability of parties to solve technical issues on the Internet, and will deprive some registrants of an important capability they currently deploy. Second, the proposal creates significant, unnecessary technical and operational problems. It basically breaks how EPP is structured to handle contact data, would complicate transfers, and more. Below we propose a better solution that serves registrants and security better, without such wide-ranging technical changes.

In the interest of security and stability, SSAC suggests a simpler solution that requires fewer changes and takes advantage of EPP’s object-based model:

Registrars must offer the RDH the opportunity to provide a full Technical Contact, containing the same data fields that are provided for Registrant contacts. The Technical Contact should be optional for the RDH to provide. If a Technical Contact is provided to the registrar, the data must be provisioned to the registry, and the following fields must be published in public RDDs output: Name, Phone, Email, City, Country.

Recommendation 4 states that Tech fields data should be processed. The EPDP Working Group is discussing the lawful basis for doing so. The SSAC would like to point out that the RIPE-NCC has deployed a model for doing this within the EU, and it may offer an example of how this can be accomplished.

The Report says: “the EPDP Team recommends that the following data elements are optional for the Registered Name Holder to provide: technical contact name, email, and phone number. (Note: the EPDP Team is still considering whether optional also means optional for the registrar to offer the ability to the Registered Name Holder to provide these data elements, or whether it would be required for the registrar to offer this ability).” In the Data Elements table, these are presented as:

Tech ID (optional)

¹⁰ Between April 2018 (the last full month before GDPR went into effect) and October 2018, per ICANN’s complaint statistics: <https://features.icann.org/compliance/dashboard/report-list>

Tech Fields:

- Name (optional)
- Phone (optional)
- Email (optional)

Recommendation 4's Data Elements Fields proposal inadvertently requires significant changes to the EPP specifications and client-server implementations. This would create unnecessary confusion for current domain contacts, and would create unnecessary additional implementation delays. It will create a series of operational issues since registries would still be required to provide support for a technical contact.

We see only two ways to implement such "Tech Fields" in EPP. One option is to make those three pieces of data fields in the domain name object itself. But that breaks the way EPP handles contact information. The other option is to put the data in a new kind of EPP "Tech Field" object. However, this new "Tech Field" object would be different from the contact objects used for the Registrant role, since Registrant contacts have a different set of mandatory data fields. Note that in EPP, contact objects are "generic" in that all contact objects contain the same required or minimum data fields. A contact object is then *associated to a role* with the domain: Registrant, Admin, Tech, or Billing.¹¹ In EPP there is currently no such thing as a "Tech Contact Object" or an "Administrative Contact Object" – there are only generic contact objects, which are designated to serve a particular role when associated with a domain name object.

The EPDP proposal would break that paradigm. Among the other implications: when creating objects, registrars would have to specify the Role that the contact object will be (and can only be) used for, which is something that is not done now. And registrars would have to create all-new "Tech Field" objects. to replace all existing contacts associated with Tech Contact roles.

The "Tech fields" proposal also creates transfer problems. Some registrars have stated that they want to offer Tech contacts to their registrants. What will happen when a registrant using such a registrar wants to transfer his or her domain to a registrar that does not support Tech contacts? Introducing this kind of discontinuity and lack of standardization into the domain registration and management process is neither necessary nor desirable.

3.4 Section 3, Part 1: Purposes for Processing Registration Data: Recommendation #2: Standardized Access:

SSAC notes two of its recommendation from SAC101:

- Recommendation 1D: "The ICANN Board should support the creation of an accredited RDDS access program, with the ICANN Organization ensuring the creation, support of, and oversight of the supporting technical access mechanism."
- Recommendation 3: "The ICANN Board and EPDP policy-makers should ensure that security practitioners and law enforcement authorities have access to domain name contact data, via RDDS, to the full extent allowed by applicable law."

SSAC notes the ICANN GAC's Consensus Advice to ICANN of 28 June 2018: "The GAC advises the ICANN Board to: Take all steps necessary to ensure the development and

¹¹ See RFC5733: "Extensible Provisioning Protocol (EPP) Contact Mapping", <https://tools.ietf.org/html/rfc5733>

implementation of a unified access model that addresses accreditation, authentication, access and accountability, and applies to all contracted parties, as quickly as possible."¹²

3.5 EPDP Team Preliminary Rec #7

The RAA currently requires that several other types of data be collected, data that has never been displayed in RDDS. For clarity, the report should state that these RAA provisions are not affected and should remain in place. Most important is the identity of the “Account Holder”, which the RAA defines as “the person or entity that is paying for the Registered Name or otherwise controls the management of the registered name, when that person or entity is not the Registered Name Holder.”¹³

3.6 EPDP Team Preliminary Rec #11 / Question #7 for community input

The questions are: “What other factors should the EPDP Team consider about whether Contracted Parties should be permitted or required to differentiate between ... natural and legal persons? Are there any other risks associated with differentiation of registrant status (as natural or legal person) ... If so, please identify those factors and/or risks and how they would affect possible recommendations, keeping in mind compliance with the GDPR.”

The GDPR states clearly that it “does not cover processing of personal data which concerns legal persons.” We recommend that registrars be required to deploy mechanisms that ensure a reliable declaration or determination of natural or legal person status for new registrations going forward, and to eventually obtain those declarations or determinations for existing registrations and their registrants.

Contact data associated with natural persons should be published in RDS. In SAC101, SSAC stated: “The new policy [The Temporary Specification] allows RDDS operators complete freedom to choose when to redact domain contact data from publication, whether or not a domain contact is protected by GDPR or by any other local privacy law. The result has been blanket redactions, hiding more data than is legally called for. A more balanced and justified approach is needed.... access should not be less timely, more restricted, and less public than law requires.... We also note that as of this writing, most ccTLD operators in the European Union continue to publish some (and sometimes all) contact data fields for domains registered by legal persons. Some continue to publish some personal data for natural person registrants in public WHOIS output.”

SAC101 also highlights RIPE-NCC’s solution, which allows for the publication of data about natural persons contained in the contact data for legal persons. This process provides mechanisms that RIPE-NCC says were specifically designed to comply with GDPR.¹⁴ The

¹² GAC Communiqué – Panama City, Panama, <https://gac.icann.org/content/Migrated/icann62-panama-communication>

¹³ See also RAA section 1.2.

¹⁴ See “How We’re Implementing the GDPR: The RIPE Database”: <https://labs.ripe.net/Members/Athina/how-we-re-implementing-the-gdpr-the-ripe-database> and “How We’re Implementing the GDPR: Legal Grounds for Lawful Personal Data Processing and the RIPE Database”: <https://labs.ripe.net/Members/Athina/gdpr-legal-grounds-for-lawful-personal-data-processing-and-the-ripe-database>

SSAC Comment on Initial Report of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process

RIPE-NCC solution seems to be balanced in that it provides contactability and does not over-apply the law. SSAC believes that RIPE's model deserves a full examination and neutral legal evaluation. SSAC also notes that the European Data Protection Board's advice on this subject was qualified thusly: "EDPB considers that personal data identifying individual employees (or third parties) acting on behalf of the registrant should not be made publicly, *available by default* in the context of WHOIS." [emphasis added]

We also recommend the following:

1. Introduction of a policy requiring registrants to make a legal or natural person declaration.
2. Obtaining declaration would be mandatory for registrars to implement within a reasonable time.
3. A declaration would only be required during registration events, i.e. when a new domain is registered, or when an existing domain is renewed or transferred (by gaining registrar). This would eventually "fill in" status data about existing/historical registrations.
4. Registrar may make declaration on behalf of registrant if the registrar has reasonable knowledge of registrant's status and the registrant has not made a declaration of its own. This would be applicable to registrars with specific business models, for instance when they only process registrations on behalf of organizations where it is clear that the registrant falls into a particular category based on their relationship with the registrar.
5. Registrant may change its declaration at any time.
6. The absence of a declaration results in assumption that the registrant is a natural person; i.e. a default redaction of data.
7. Inaccurate declarations will be subject to a revised WHOIS inaccuracy complaint process.

3.7 EPDP Team Preliminary Rec #12 / Question #8 for community input

The question is: "Should the EPDP Team consider any changes to its recommendations in relation to 'reasonable access'?"

Yes. We recommend standardized, transparent requirements for "reasonable access" that can be clearly understood by contracted parties and potential requestors, and are clear enough to be enforced by ICANN Compliance. The current lack of definition inhibits reasonable requests and impacts the ability of security actors to fight abuse and cybercrime. Notable accounts of these problems are contained in the Joint APWG/M3AAWG GDPR and WHOIS User Survey results,¹⁵ and statements from the 60-plus members of the Cybersecurity Tech Accord.¹⁶ The Temp Spec's current requirement is so vague as to be unenforceable.

We recommend:

¹⁵ <https://www.icann.org/en/system/files/correspondence/upton-to-marby-et-al-18oct18-en.pdf> and <https://www.icann.org/en/system/files/correspondence/jevans-to-marby-et-al-18oct18-en.pdf>

¹⁶ https://cybertechaccord.org/mechanism_to_access_whois_data/

SSAC Comment on Initial Report of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process

1. Registries and registrars should provide their determination (either provide the data or issue a denial) within a specific timeframe determined by policy, that is enforceable.
2. The registry or registrar must provide a substantive rationale for a denial. Registries and registrars shall maintain the records related to such requests for one year, and during such period, shall provide such records to ICANN upon reasonable notice. This is similar to the abuse complaint requirement in the 2013 RAA and Spec 11 of the Base Registry Agreement.
3. There must be better requirements for prominently publishing and explaining the request process and contact info. A current problem is that it is very difficult for interested parties to find the information needed in order to make and track a request on registrar and registry websites. These requirements should be parallel to the Abuse Contact publication and management requirements that ICANN proscribes, for example, in the RAA and Base Registry Contract.

4. Acknowledgments, Statements of Interests, and Objections and Withdrawals

In the interest of transparency, these sections provide the reader with information about four aspects of the SSAC process. The Acknowledgments section lists the SSAC members, outside experts, and ICANN staff who contributed directly to this particular document. The Disclosures of Interest section points to the biographies of all SSAC members, which disclose any interests that might represent a conflict—real, apparent, or potential—with a member’s participation in the preparation of this Report. The Dissents section provides a place for individual members to describe any disagreement that they may have with the content of this document or the process for preparing it. The Withdrawals section identifies individual members who have recused themselves from discussion of the topic with which this Report is concerned. Except for members listed in the Dissents and Withdrawals sections, this document has the consensus approval of all of the members of SSAC.

4.1 Acknowledgments

The committee wishes to thank the following SSAC members for their time, contributions, and review in producing this report.

SSAC members

Greg Aaron
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SSAC Comment on Initial Report of the Temporary Specification for gTLD Registration Data Expedited Policy Development Process

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4.2 Statements of Interest

SSAC member biographical information and Statements of Interest are available at:

<https://www.icann.org/resources/pages/ssac-biographies-2018-03-02-en>

4.3 Objections and Withdrawals

There were no objections or withdrawals.