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STEPHEN DEERHAKE:

Okay. Thank you. Thanks, Kim. I can't see actually who's on but it looks like we have a few people at least. So good morning, good afternoon, and good evening. I want to thank everyone for joining today's teleconference. For the record, this is the 16 December, 2020 edition of the ccNSO PDP Working Group tasked with developing ICANN policy with respect to establishing a review mechanism for ccTLDs as mentioned in RFC 1591, section 3.4. And we've convened this meeting today, 00:00 UTC. That might be the first time we've done that actually.

I want to thank all of you who stayed up either really late or have gotten up really early for your participation on today's call. And with respect to time-wise, it's not great for us in the Americas and it's rather early for those of you guys near the Meridian.

Sweet spot for those in the Asia-Pacific region for a change. And of course I wish to thank Joke, Kimberly, Bart, and Bernard for their work today with our call. Sincere thank you to Bart and Joke for getting up really early and of course thanks to Kimberly for staying up late and for her usual Zoom magic.

This is our last meeting of this crazy year. And I do want to take the opportunity as chair of this working group to thank you all for your contributions and participation over the last year and wish you all the best as we dive into the end of year holiday and rest season, that will carry us into 2021. And I really sincerely hope that we can meet again together in person at some point in 2021.

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

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So, I want to thank everyone for participating again in today's call. With regard to administrative announcements, I do not have any. Bart, Bernard, have I missed anything? I don't think so but let me know.

BERNARD TURCOTTE: Not on my end.

BART BOSWINKEL: Nope.

STEPHEN DEERHAKE: Okay, good.

BART BOSWINKEL: Stephen. There is another one. It's more, yeah, maybe wait one or two minutes because you're reaching your quorum. I think we passed the quorum now. You have a lot of staff, I would say on the call today.

STEPHEN DEERHAKE: What am I looking at? I'm looking at 13 participants. One, two, three, four, five...

BART BOSWINKEL: By now you're at seven, eight participants so you could start.

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BERNARD TURCOTTE:           Yep. No that's minimum but workable.

STEPHEN DEERHAKE:        I didn't know we had a quorum minimum but...

BART BOSWINKEL:           We do. We changed the rules of engagement some time ago. I think it was five. But at least some people got up very early or stayed up very late.

EBERHARD LISSE:            What was the quorum number again?

BART BOSWINKEL:           I think it was five at that time.

EBERHARD LISSE:            But we're well over that so, yeah.

STEPHEN DEERHAKE:        I think we're good.

EBERHARD LISSE:            Get it over with.

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BART BOSWINKEL: That's another way of putting it.

BERNARD TURCOTTE: [With this sound] encouragement from Eberhard.

STEPHEN DEERHAKE: Yeah, no, I...

EBERHARD LISSE: I was the one who started the quorum debate, yeah. So, I think we should—we are more than five, we are eight. And if somebody—there will be usually a few latecomers and if people don't join, people don't join.

BERNARD TURCOTTE: But we will record it and make it available for everyone [inaudible] have anything to do.

BART BOSWINKEL: Just know you passed your quorum. You passed your quorum.

STEPHEN DEERHAKE: Yeah. It's okay with me as best I can tell. So, who can we beat up who's not on the call? I mean, I...

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BART BOSWINKEL: Go ahead, Stephen. Go ahead, Stephen. You've met your quorum.

STEPHEN DEERHAKE: Okay. Well, thank you for weighing onto that. Okay. So, we don't have—and we're not looking at any administrative matters. I'm glad Peter's here. Kim's here. That's good. Maarten's here. Sean's here. Okay. Mentioned on the last call, work is continuing to carve out the retirement policy document developed by our sister working group, the retirement group so that it can be presented to the ccNSO Council and Membership independent of our work here.

We've got a final draft that we're circulating internally in that group and we expect to have it sorted out to be presented soon and kicked out of the working group for council public review, etc., etc. That's it for administrative matters. With regards to action items, I've got none. Don't believe that any were carried over from our last teleconference. Bart, Bernie, you know, interruptive—an error there. Otherwise—go ahead, sir.

BERNARD TURCOTTE: There was just the implicit one of updating the spreadsheet which I've done and we'll go through it today.

STEPHEN DEERHAKE: Yeah. Well, okay. Still agenda [displayed.] So, the thought today is we'll continue with review and a final review, really, of the decision point spreadsheet that Bernard has been working on that we've been discussing the last couple of meetings. Thank you, Kimberly. So, the plan

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of the day is pick up where we left off last time, dive into some of the adjustments Bernard has made given our last discussion.

And I really, really would like to see us push forward on this so we can get closure and begin actual language drafting as soon as possible. I do think it will be beneficial to have some input from ICANN legal regarding our deliberations to date once we finalize this.

So, expect an early meeting next year where we can question them with regards to what we're trying to achieve here. I believe we need to get at least some [initial] buy-in by ICANN legal on the path we're going down. And with that, I will turn the floor over to Bernard and Bernard, the floor is yours, sir and thank you again for your work on this.

BERNARD TURCOTTE: Thank you, sir.

STEPHEN DEERHAKE: Carry on.

BERNARD TURCOTTE: All right. On delegations, not much is new. We still have one remaining question. If one party is chosen and another party wishes to appeal, we ended up talking about, should there be conditions to avoid a last-minute application? And so, we haven't really resolved that and that it's not critical that we do so right now but at some point or other, we will have to figure out what the limits are on that thing so that we don't end up in that scenario where it gets put on a board agenda and then someone

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submits an application for the delegation of a new ccTLD. So that's about all I have on delegation. Are there any questions or thoughts?

STEPHEN DEERHAKE: Do we have any? I don't see any hands.

BERNARD TURCOTTE: All right. Great.

STEPHEN DEERHAKE: Can we assume approval then? Yes.

BERNARD TURCOTTE: Yeah. Okay, great. On the transfer, there is no change. Basically, only the participants in the transfer can apply and we've not made any changes. I should probably talk about the other mechanisms for a second. Sorry, I forgot about that. After talking or exchanging emails with the ombuds, it became rather clear that that probably would not be a viable path for us to use as an alternate mechanism.

And then Kim was kind enough to give me some of his time last week when we talked about the various mechanisms that could be used at PTI. And really, the only one that would seem to apply to a single situation would be the PTI internal escalation mechanism which is purely an internal one but is an official mechanism.

So, if there is no board intervention, if you will, we would then be talking as in the first line of delegation as the first mechanism would be a PTI

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internal escalation. The second mechanism, if we decide to throw that in and I'm still strongly recommending this mediation as a requirement before going into an official appeals, as a minimum, as a way of everyone understanding what they're getting into, and (b) as a possible way of resolving any issues without having to go through a full appeals procedure.

If in the second line for the delegation has been approved by one of the parties, there is a decision by the board, any board decision can go through a reconsideration process. And we'll see a little later on in some of the other things.

It's not a fantastic thing but it is in the bylaws of ICANN so there's no way around it. You cannot proceed to CEP and IRP because we have officially opted out of that but any board decision can be up for reconsideration. Now, as Kim has noted several times at these meetings, what the ICANN board actually approves is that PTI has done its job and what exactly a reconsideration request will bring in this case is really unclear.

But nonetheless, there it is. Probably the part that's a little bit more problematic is, as we have discussed in the past, between the time the board puts its stamp on a request by PTI for a delegation and it actually going into the root, is a very short time. A matter of a day or two, I guess, from what I remember of our conversations.

And if we're going to build in these appeals mechanisms in those various other things, if we're going to allow people to take advantage of them, then probably one of the biggest changes will be to make sure that there



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is time to apply for those things. So, this comes mainly when there is a board decision.

We will see that under the delegation of a new ccTLD, under a transfer and under a retirement, obviously. So, what you will see then, depending on the type of decision, is you will see PTI internal escalation, mediation, or if there is a board decision, reconsideration request followed by a mediation which is to be determined. Now, as we said transfer, basically goes to the board for a confirmation. And then we...

STEPHEN DEERHAKE: Hello, Bernie. Bernard, I think we lost you.

BERNARD TURCOTTE: Yes, I know. My headset once in a while decides to take a walk.

STEPHEN DEERHAKE: Now you're back.

BERNARD TURCOTTE: I am back. As discussed at our last meeting, the first line in yellow, PTI action not completed in a reasonable time. So, basically, we wanted an appeals mechanism to apply if the applicants for a particular procedure thought that PTI was taking too long. This will mostly, I think only apply in the case of delegation of a new ccTLD or a transfer.

The rest of the things are either driven by IANA and so the manager or the applicant are not waiting on IANA but it's being driven by IANA. Now,

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what we will have to consider in here are of course similarly to the appeals for a losing party in a delegation, what are the guardrails on this thing?

It's probably not a wise idea to simply leave it wide open. What if someone puts in an application for a delegation and after a month feel they've provided all the information and get upset. We all know that that's not the way it works. So, there will be a bit of work on establishing the guardrails that create the requirements for allowing an appeal if someone wishes to use this procedure. I'll wait here because this is a brand new one. Are there any questions or thoughts?

STEPHEN DEERHAKE: Anybody with any comments?

BERNARD TURCOTTE: Peter?

STEPHEN DEERHAKE: I don't see any.

PETER KOCH: Yeah. Good morning. I'm just wondering, appeal of inaction is of course a bit difficult and that differs from the others. And maybe this needs a subclause or something because if there's real inaction, that's one thing. And imagining what could happen is probably a dispute over who has to act next like the IANA functions operator telling the party or parties to

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get their act together, sit together and discuss things. Whereas one or either of the parties believe they need a decision in their favor. So, I'm not sure whether we really catch all the different scenarios here or I'm also not sure whether we have to.

BERNARD TURCOTTE:

Yeah. This one is a different beast as I have mentioned in the past, in that, you're not appealing a decision by IANA. You're appealing a lack of decision. However, if we go to the IRP system in ICANN, there is grounds for appeal for an action by the ICANN board or inaction in certain cases. So, I mean, it's not completely strange but this is why I'm saying we're going to have to be really clear on, when I say guardrails, what are the conditions that need to be met here?

Because in a new delegation, the thing that usually goes on has been confirmed by Kim is an applicant or applicants will put in their applications. The applications will be deficient. They'll send them back explaining what needs to be fixed and this can go on for a little while and some people may get frustrated.

So, I think we want to make sure that we're not creating a system which is going to cause more problems but if there is a real problem with some good guardrails, then we could use either the PTI internal escalation mediation or if nothing else works, an appeals mechanism.

But I would say, I think this would be a rarely used one if at all but we're building the system for the future and these are part of the things. Any other thoughts or comments? Did that answer your question, Peter? Sorry.

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PETER KOCH: Yes. Thanks. Bernie.

BERNARD TURCOTTE: All right.

STEPHEN DEERHAKE: Thank you, Peter.

BERNARD TURCOTTE: Any other thoughts or comments? Maarten?

STEPHEN DEERHAKE: Hand up for Maarten.

MAARTEN SIMON: Yes. Well, I think it's good to have an option to make this something of an appeal. But I think that in general, most of the case should be solved by internal escalation procedure and I assume it will. But maybe it's necessary to have the inaction one. And I'm struggling from the beginning with this because it's not clear for me enough what the procedure for revocation is. And I've said something about it before but you may help me here again.

BERNARD TURCOTTE: You're jumping the gun a bit. We will get to revocation in a few minutes.

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MAARTEN SIMON: Yeah, I know. But you said it can only be used in the case of delegation transfer so maybe we should talk about it when we discuss revocation. I'll wait for that.

STEPHEN DEERHAKE: Okay. Thank you, sir.

BERNARD TURCOTTE: Okay.

STEPHEN DEERHAKE: And I saw a hand from Eberhard but it seems to have gone away.

EBERHARD LISSE: Yeah. I want to talk about revocation with Maarten when we reach the point.

STEPHEN DEERHAKE: Okay. Thank you, sir.

BERNARD TURCOTTE: Great. Okay. So, that is action not completed. Okay. Retirement has not significantly changed except for other mechanisms. However, what I've done is, in looking at the reconsideration request and chatting with Kim about this, there are really two phases about this. PTI would probably—

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and correct me if I'm wrong, Kim, PTI would probably not seek board approval to send a retirement notice in this case.

So, there would be a straight line of PTI internal mechanism, mediation, and appeals. Let's not forget that this is a process which will probably take us a minimum of five years. So, we're talking about plenty of time and PTI would probably seek board approval when it's ready to remove the ccTLD from the root.

And in that case, then we would get a reconsideration request possibility and so, we have to figure out what the timing is on those things, etc. The final piece of retirement did not really change its failure for PTI to grant an extension. And that's we've described it fairly well and it's got the standard things. So, on retirement, I see Stephen has his hand up.

STEPHEN DEERHAKE:

Thank you. If I could put Kim on the spot, does what Bernard just described, are you guys comfortable with it, I guess is the best way to phrase it? So, Kim Davies, if you could respond to that, that would be great. Thank you.

KIM DAVIES:

Sure. Thank you, Stephen. I think in broad strokes, yes. I mean, with the caveat that there is no retirement policy to date and on the assumption that it's going to be adopted in its current or similar to its current form, we will then be tasked to create an implementation of it.

And what Bernie described is where my head's at in terms of what our implementation will look like. We would devise an implementation that

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would see an automatic trigger based on the events, ISO standard changing and so forth.

But at some point, during the journey from there to ultimate removal from the root zone would be a step where the ICANN board of directors would be involved in its review in line with other actions would take for delegations and transference. So, insofar as I can see the future, I think that that's a fair assessment.

STEPHEN DEERHAKE: Okay. Thank you, sir. Bernie, over to you.

BERNARD TURCOTTE: Thank you. All right. Now for the much anticipated revocation, Kim, if you could drop down a bit so we get all of revocation. [I actually have more than one or are we going to lose it in the page?]

EBERHARD LISSE: Not that I can read any of it anyway.

BERNARD TURCOTTE: Okay. So, revocation. I thought I had more lines there. Let me see if I can pull this up.

STEPHEN DEERHAKE: We need a smaller font.

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KIMBERLY CARLSON: I brought up the spreadsheet instead.

BERNARD TURCOTTE: Okay. There we go. Okay. So, revocation, contesting an approved revocation. The manager wishes to appeal that. As I've said, we really need to understand what the process would be for this etc., etc. So, someone appeals that from the PTI notice. And then I did the same thing as I did for retirement imagining that there will be some notice from PTI with the manager, there will be exchanges.

And so the appeals mechanism we're developing would kick in to that. And then if that fails for the ccTLD manager and PTI is ready to transfer because as we say, a revocation goes hand in hand with a transfer, then it would have to go to the board. And again, therefore we would be open for a reconsideration request for the revocation.

But then as we discussed at our last meeting, there could be a disagreement between parties who would want to be the recipients of the transfer. And so, again, we really need to understand the process because it's unclear if it would be a standard application process or what.

So this is the way I've broken it down. The first part is just an appeal because PTI has given the manager notice they will be revoked. The second part is various appeals mechanisms have failed. PTI is proceeding with the revocation, asking the ICANN board for revocation and transfer, this would be open for a reconsideration request.

And, of course, then is the issue that we discussed at our last meeting if there are contending parties to receive this transfer for the ccTLD. Again,



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part of the issues here is, we haven't seen what the process for a revocation looks like. Be glad to take thoughts and questions. Eberhard?

EBERHARD LISSE:

Okay. So, just to recap for Maarten. And it's two ways the delegation can be shifted from an incumbent manager to a new one. One is by consent. That would be what we call a transfer and one is when there is no consent. And we have defined how consent means so we don't want to go into the details.

Without consent, it is only possible to do this if there is substantial misconduct. And that is also defined and I suggest you Google and read the final report of the framework of Interpretation Working Group which was chartered because the RFC 1591 under which most of us or rather all of us operate is not written very clearly.

So, if somebody grossly misbehaves, substantially misbehaves repeatedly, doesn't listen to the PTI which advises, gives options to remediate and then and only then can the decision be taken to transfer the ccTLD away from the manager against his consent. And that's what we call a revocation and that's appealable. Is that good enough?

MAARTEN SIMON:

Thank you, Eberhard. And I do understand how it works and thank you for pointing me to the framework of interpretation. I've read it. The point I always have here is that, usually there's a trigger and the trigger is someone's complaining at PTI.

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And we don't take that into account with our appeals mechanisms and I can understand that but it's, still I think from the outside world, it may look a bit strange. That if you complain to PTI, that there is a situation wherein you as a complainant feel that a revocation should take place. Well, PTI said, no. We think that there is not anything you can do other than go back to PTI and say it again. And so I wonder if it's—

BERNARD TURCOTTE: I see your point. Yes. Okay.

MAARTEN SIMON: And I may open up some can of worms here but it feels a bit strange that there is no appeal there. So what would happen? And I have no clue because I have the same struggle with, okay, what's the process for revocation?

BERNARD TURCOTTE: I think we've got a few hands so let's walk our way through. Eberhard, can I just ask Kim to step in for a sec and give us his thoughts?

EBERHARD LISSE: I was going to suggest that actually.

BERNARD TURCOTTE: Great minds. Kim?

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KIM DAVIES:

Thanks, Bernie and thanks, Eberhard. I mean, the thought I had, I mean, I think this is an interesting dimension to explore. The practical reality I suspect is that a revocation request would rarely, if ever, not be accompanied with a transfer request on the assumption that if a ccTLD is an ongoing operation, the intention is to continue with operating but under a new operator.

So, therefore, even though you could distinguish [it a] lack of PTI willing to perform a revocation, the way it would execute would be very similar to what we have on row six of the spreadsheet which is failure to accept an application for transfer.

So, perhaps the right lens to look at it is a similar situation where ultimately the party that wants to receive the transfer to their domain is unsuccessful. Whether it's by virtue of implementing a revocation first or even if it's a consensual transfer that PTI is rejecting that or failing to accept it. Hopefully that's useful.

BERNARD TURCOTTE:

Thank you, Kim. Eberhard?

EBERHARD LISSE:

We are starting to dig a ditch and I am—which is the standard of breaking consensus. Where are we coming from? We're coming from RFC 1591 which is basically intended that managers who are dissatisfied with a decision can appeal. There is no provision.

And remember, we are writing this for ccTLD managers. We are not writing this for ICANN. We're not writing it for third parties. We're not

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writing it for governments. We're writing this for ccTLD managers, if they are aggrieved by decision of PTI and ICANN.

If a method where third parties can intervene in internal affairs of ccTLDs by starting revocation proceedings for no cost which then would be appealable, would be beyond my understanding of this working group's remit. And I would not be able to have consensus and to provide consensus on this one. Fundamentally opposed against it and I will do whatever I can to not make this happen.

BERNARD TURCOTTE: All right. Thank you, Eberhard. Stephen?

STEPHEN DEERHAKE: Bernard, you carry on.

BERNARD TURCOTTE: Well, actually we're done. The last part is the failure to accept the proposed IDN ccTLD string. As we've said, we want to leave some hooks but until the IDN ccPDP is done, there is nothing official we can do about it.

So, what I'm taking away from what we've got here is, there's a few tweaks I need to do to this table following the conversation. There are some things which we're really going to have to understand what the process looks like before we can go further and that's about it for me. I see a hand from Eberhard.

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EBERHARD LISSE:

I have forgotten to mention that I do not currently see a way out of the legitimate question that Maarten poses. We have defined substantial misconduct as we know it when we see it but what would be the PTI mechanism? Do they act independently when they notice something that they feel is important or do they require a third party to put in an application or a notification?

I would like to hear Kim's thought on this without putting him down to making policy or making guidelines of giving us a firm decision. I'd just like to hear the thoughts of it. It's a rare occurrence, has never happened, as far as I know but I would like to see what they're feeling at the moment about it.

KIM DAVIES:

I think our general philosophy on all things root zone-related is we're reactive rather than proactive in terms of generating change request activity. So, I'm struggling to imagine a scenario where it would be within our mission to proactively seek a revocation when it hadn't been triggered by some external event that had brought it to PTI.

Particularly given that as for my last intervention, I think, the practical reality is revocations will almost always be paired with a transfer. And the transfer implies that there is some entity that's come forth and wants to operate the ccTLD as a replacement for the incumbent operators. So, I mean, I think about it some more, and maybe there's some scenarios we could conjure up but they seem highly unlikely.

EBERHARD LISSE:

But the point is, if [inaudible], if let's say—let's not speculate but if events come to PTI's notice that PTI can consider reasonably to be substantial misconduct, you would obviously first contact the ccTLD manager and start the process to remediate.

And it's the end point that well, doesn't work best. We have got security and stability issues for the whole internet and so on and then you would act somehow some—but my point is that if somebody says, "I don't like [Olaf's] behavior this week," I'll ask for a revocation to a commercial company that my brother-in-law owns for .nl. And if Kim tosses it, then we appeal against it. I don't think that's what we're here for.

BERNARD TURCOTTE:

All right. Thank you, Eberhard. Do we have any other thoughts or discussions on this? And we have in the chat an approval from Maarten. All right. I will note the following when I say we really need to understand the process. The basis for going to a full appeals mechanism or review process, the first thing that people do is they want to see a formal procedure and they want to be able to walk through it and put in the check marks and see that everything has been done.

And so, I think this will be one of the challenges for PTI is to make sure that they can meet those types of requirements. And regardless of the mechanism, we actually ended up with four appeals. They all end up at this place first.

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We have to have really clear procedures. In the IRP, it's, what do the bylaws say? If there are some places where it's a little fuzzy, then it's a little interpretation. But if the bylaws say you will go through this committee, this committee will give you a report, then you will approve it, then that's what the bylaws say and that's what you check in.

And if you haven't done that, then the managing party is obviously starting with a bad situation to get its decisions confirmed by an appeals panel. So, that to a certain extent is in no way for us to tell PTI what its processes should be.

However, if we are involving PTI's processes in an appeals mechanism, PTI is going to have to understand what that means and may require for them to review some of their procedures accordingly.

That's about all I have, Stephen. Back to you.

STEPHEN DEERHAKE:

Thank you sir. I really would like to get closure on what has been presented. We've gone over this repeatedly. We are, I believe, at a decision point. I don't think there's anything controversial here. My take on it is put it out on the list and say if you've got an objection to what has been discussed this evening my time, express it. Otherwise, we will give a timeline for descension on this and otherwise, it's going to be accepted as our roadmap going forward. I feel that's the way to go.

I see Bernie's got his hand up, so Bernie, your thoughts.

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BERNARD TURCOTTE: I would like to, as per what I said on this call, give it one last cleanup, and then we could do that.

STEPHEN DEERHAKE: Yes, that's fine, but I really want to get this out to the community, membership on the list with an, "If you don't object, this is where we are, this is what we've decided," because we've got to cross this threshold and I'd like to do it before the end of the year. Thank you on that.

Kimberly read my mind. Do we have Any Other Business?

BART BOSWINKEL: Stephen, I can't put my hand up. Bernie, when do you think you might be ready with cleaning up the table?

BERNARD TURCOTTE: I'll have it to you by Friday.

BART BOSWINKEL: Friday.

STEPHEN DEERHAKE: Thank you.



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BART BOSWINKEL: Thank you. So that means by Monday, we're going to circulate this to the group and give them, I think, say, a week into the new year, something like this. Would that work?

STEPHEN DEERHAKE: [I'd give it until the end of the year.] I really want it done by the end of the year.

BART BOSWINKEL: Okay, then we give them until the end of the year. But might be useful, Stephen, if you circulate an e-mail already over the next day or two to the group saying, "Expect this, and there are hardly any changes, just a cleaned up version of this. And if you have an issue somewhere, you need to raise it over the next week or before the end of the year."

Because I think a lot of people will go on holidays already next week.

STEPHEN DEERHAKE: I realize that, but there's so little left here to clean up. I just want to get it cleaned up before the end of the year.

BART BOSWINKEL: Yeah, but do it with a prewarning, it's coming, and give them until the end of the year.

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STEPHEN DEERHAKE:

Yeah. Duly noted, and I'll let ... When Bernard's got it ready to go, he can drop it on the list as far as I'm concerned. So, okay, thank everyone for that. Any Other Business? I'm not seeing a huge waggle of hands. So we're next scheduled to meet at 13:00 UTC on the 6th of January, and hopefully we'll have this finalized so we can go into our next phase. And our meeting after that is going to be on the 20th at 21:00 UTC. So again, convenient times for the Europeans on this group and for those in the Americas as well, but less convenient times for those in Asia Pacific, and I apologize, but it is what it is.

Any other comments, discussion, questions from anybody? Not seeing any, that being the case, we can adjourn early. So I do want to thank everyone for participating, and again, Bernard, Bart, Kimberly and Joke for their support and contributions. Do want to implore everyone to stay safe, and I hope to virtually see everyone again on our next call, which is scheduled in January, as you know.

Just want to thank everyone again at the year end for participating in this working group and wish you all a happy and safe holiday season. And I think with that, I'll declare this meeting adjourned. Thank you, everyone. Kimberly, you can stop the recording. As always, thank you for your technical support. We're done. Cheers. Happy new year, everybody, happy holidays.

**[END OF TRANSCRIPTION]**