
MICHELLE DESMYTER: Welcome, everyone. Good morning, good afternoon, and good evening. Welcome to the At-Large Consolidated Policy Working Group call on Wednesday, the 14th of July, 2021.

Due to the increased numbers of attendees and in order to save time, we will not be doing the roll call. However, all attendees, both on the Zoom room as well as on the phone bridge, will be noted after the call today.

I would, however, like to note the apologies. We do have Evin Erdogdu from staff, Jonathan Zuck, Judith Hellerstein, Priyatosh Jana, Justine Chew, Vanda Scartezini, Roberto Gaetano, and Christopher Wilkinson.

From staff, we do have Devan Reed and myself, Michelle DeSmyter, on call management. Heidi Ullrich will be joining us shortly.

I would also like to note that we will have real-time transcribing provided for today's meeting, and I'll be sharing the link in the chat in just a moment.

A friendly reminder to please state your name before speaking for the transcription and to please keep your phone lines muted when not speaking to prevent any background noise.

With this, I will turn the meeting over to Olivier Crépin-Leblond. Please begin, Olivier.

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.

OLIVIER CRÉPIN-LEBLOND: Thank you very much, Michelle. Welcome to this week's Consolidated Policy Working Group call that is light on attendance do to, well, French Bastille Day but also the U.S. Internet Governance Forum, taking place simultaneously today. Of course, we also do have a lighter agenda, as you're going to discover right now.

So first we'll look into our work group updates and we will shift through maybe very updates on the transfer policy review policy development process, the intergovernmental organization curative rights work track, and the expedited policy development process on the temporary specification for gTLD registration data. And then we'll go straight into the policy comment updates. Today, Jonathan is not here, as he is taking part in IGF-USA. So I'll be taking us through the policy comment updates, of which there are two. A very light agenda. Justine Chew is not on the call. Well, supposedly not on the call at the beginning of the call, but she might join us a bit later to touch on the proposed renewal of the .aero registry agreement. Then we'll have the other two. Finally, in Any Other Business, we have an announcement for the registration to the APRALO webinar on the internationalized domain name.

That's the agenda for today. Are there any amendments, changes, or any additions to the agenda?

Absolute silence today, so that means that the agenda is adopted as writ and currently as published on your screen.

And we can move swiftly to the action items from last week's Consolidated Policy Working Group calls, of which one remains to be completed. And that's the one regarding the .aero public comment. It is

actually mentioned here that Justine will take us through a potential presentation on the 28th of July. So if she doesn't make it to today's call, then we will see [her] the 28th, just a short while from now.

Any comments or questions on any of the action items that are listed on your screen at the moment?

And I see Hadia Elminiawi has put her hand up. Hadia, you have the floor.

HADIA ELMINIAWI:

Thank you, Olivier. Actually, I have a presentation that I could share about how SSAD works, since we are actually presenting today the ALAC advice in relation to Phase 2 recommendations, which is basically the SSAD. So I don't know if we actually have time for the presentation or not.

OLIVIER CRÉPIN-LEBLOND:

Thank you, Hadia. I believe we do have time for this presentation, as the other updates will be rather short today.

ALAN GREENBERG:

Hadia, how much time do you need? It's Alan.

OLIVIER CRÉPIN-LEBLOND:

That was Alan Greenberg speaking. How much time do you expect?

HADIA ELMINIAWI: Okay. It's like seven minutes. It's just like a refreshment to what the SSAD is about and how it works.

OLIVIER CRÉPIN-LEBLOND: Perfect.

HADIA ELMINIAWI: So it's not really about the advice itself, but it is for people to remember what is the SSAD and how actually it works.

OLIVIER CRÉPIN-LEBLOND: Let's have this during the work group updates when Alan and you pick up the ball for the expedited PDP on the registration data. Fantastic. Great.

Let's then move ... Not seeing any other hands up. Am I? No, I'm not seeing any other hands up. So thank you. Let's then move to the next agenda item, and that's the work group updates. We'll start with a quick update on the transfer policy review policy development process. And for this, I believe that Steinar Grøtterød and Daniel Nanghaka are on the call. Or at least one of them is.

STEINAR GRØTTERØD: Yeah. Hello. I have a very, very short update. There hasn't been any meeting this week. There will not be any meetings before the 27th of July. But we had a call within the working group—was it yesterday?—where we kind of made some action points. One of them is

to create a document for talking points for input to the letters to the SOs that are with a deadline of August 5. This has now started with the use of a slack channel. And everybody—members, alternates, and observers—are invited to this slack channel.

I have also asked ICANN staff to assist me in making some sort of figure that can show the post- and pre-GDPR versions of the form of authentication, together with the assumption that there will be a consensus within the PDP that there will be no form of authentication on how that will impact the transfer processes.

Okay. So that's very, very short. Thanks.

OLIVIER CRÉPIN-LEBLOND: Thank you very much, Steinar. I'm looking at the queue at the moment. Are there any comments on questions on this?

No? Not seeing any hands up. I believe we can move on. And thanks for the update. We'll, of course, look forward to the further updates in the future weeks.

Now, the next work group is the Intergovernmental Organization Curative Rights Work Track, also known as the IGO Work Track. We have received an apology from Yrjö Lansipuro this week. I am not sure whether we have had ... Do we have Carlos Gutierrez on the call? That being said, the feedback that I have been provided with so far is that there hasn't been any movement on that either, which means we could probably, if no one is there to provide an update on this, skip over it and move swiftly.

MICHELLE DESMYTER: Olivier, we do not have Carlos on the call.

OLIVIER CRÉPIN-LEBLOND: Right. Thank you. So that means we can move swiftly then to the Expedited Policy Development Process on the Temporary Specification for gTLD registration data. For this, I think I'll probably first give the hand to ... Was it Alan? Did you want to take the floor first or should we start with Hadia's presentation?

ALAN GREENBERG: No, let's start first with the comment on Phase 2A. There's a Google Doc.

OLIVIER CRÉPIN-LEBLOND: Right. Okay. And if I can—

ALAN GREENBERG: [inaudible] go over very briefly.

OLIVIER CRÉPIN-LEBLOND: Mm-hmm. If I can, in the meantime, ask, I don't know whether Hadia has provided the slide deck for her part, but if that can be sent to staff, then staff will be ready to display those for the next part of the call.

And over to you, Alan.

ALAN GREENBERG:

All right. If we can go to the Google Doc. And there we are. All right. The document has been cleaned up a little bit since the last time you saw it. I think that was either a week or two weeks ago. And all of the documents have been accepted and addressed. The deadline for the document, for submitting this, is next Monday. So what I would like to do is ask for any final comments no later than the end of tomorrow, the end of Thursday. I'll clean it up on Friday and get it over to the ALAC to start their process.

So if we can just scroll down, just to take a quick look at what we have, everything that is our answers are in red. Now, this is a Google form when it will actually be submitted, but the questions have been extracted so we could see them in their context first. The answers will be what you see in red.

Scroll a little bit more, please. It takes a while to get to the first one. There we are. Question #1 was asking, is there any new input? And our answer basically is, "No, we don't have any new input, but there was significant input which really was never fully considered. And that is the issues related to the public good of making information available to the community without having to go through an SSAD-like process. GDPR, of course, does not protect the information of legal persons, but our ICANN policies do allow registrars to redact all of that information."

And we're simply pointing out that we believe there was information that should have been considered more and, in fact, probably the EPDP should have commissioned a study to try to quantify the benefits. But that wasn't done. To be candid, the timeline for completing this PDP following the public comment period is very short. I don't have any

illusions that we're really going to delve into this in great detail and make a change because of it, but nevertheless, I think we must go on public [record]—

OLIVIER CRÉPIN-LEBLOND: Okay. Fantastic then. Looking forward to be back in the call. Thank you.

ALAN GREENBERG: And thank you, Olivier, for telling us you're looking forward to be back on the call. Perhaps you want to mute.

OLIVIER CRÉPIN-LEBLOND: Oh. Thanks very much, Alan. No, it's just there were issue with my audio. So I was pulled out of the call and back in and I listened to you through Zoom. But I'm now back on the phone line. All the stuff that happens in the background while you're speaking.

ALAN GREENBERG: Glad to have you here. If we can scroll a little bit farther down to Question #2, Recommendation #2 basically says the GNSO should keep tabs on if the world is changing with relation to RDDS data (and, more particularly, the expected legislation in Europe), the GNSO should keep track of it. And this question asked, "Do we really need to tell the GNSO that?" And our answer is "Perhaps not, but given the schedule, we really should make sure that they don't ignore it." So making a recommendation perhaps locks that it in a little bit tighter.

Question #3, please. Scroll down. Now, the one thing that we may have succeeded on in this PDP is, although it does not like we will get registrars to be required to differentiate between legal and natural, we may have succeeded in getting an element of the RDDS created which says it is a legal or natural registrant. It's not clear whether we will mandate that they have to use it. Certainly, if they don't differentiate, they don't use it. But if they do differentiate, there is a question about whether they must use the field or perhaps could just keep it private to themselves. We are advocating that not only should the field be created but it should be used, it must be used if necessary, it should be transferred to registries so registries can know, and it should go into escrow so, if the registration is transferred away from a registry or a registrar due to bankruptcy or other failure, that information is maintained. It's not clear whether we will succeed on any of those, but we are pushing in all the directions.

Next one, please. That's #4. And the question is at the bottom of the page. That one talks more about, what should the value be? There was an inordinate amount of discussion within the EPDP on what the value should be. Should it be yes/no? What if there is no differentiation made or it's impossible to make a differentiation? And there were things suggested like "unknown." That, of course, does not make it clear who does not know it. Our suggestion is to just leave it blank. If it's blank, then we don't know the answer, but we're not trying to define who it is that doesn't know the answer.

There were also suggestions made that the field should contain more subtle, specifically that, yes, this is a legal entity, but there is natural-person information contained in the registration. Again, we're

looking for a nice, straight, simple one, and it goes along with the legal advice the EPDP got that, if you do declare yourself as a legal person, then you are obligated to make sure you are not included natural-person information within your registration elements. And, again, we're reiterating the various uses.

Question 5. This one is the question of, if you differentiate, must you use the field? And from our perspective, if the field is there, why would you not be required to use it if you know the information? If the information is available, then it could be used. Specifically, it could be used to display the information publicly because it is information about a legal entity. There's no legal reason not to display it. If it is not used, then the registrar has made the differentiation, but it's a secret and they don't tell anyone. And that seems to be a rather pointless exercise. So we are advocating that the field must be displayed—or not “must be displayed.” Sorry. “Must be set.” Whether it is displayed or not is a different issue.

And we can scroll to Question #--whatever the next one is—6. This is the question on the guidance. Guidance is suggestions to registrars as to how they might differentiate if they choose to differentiate. It's not clear that most registrars couldn't figure this out on their own if they choose to differentiate. Yeah, that's the right place right now. But we are providing guidance as the main output of this PDP. And the question is, do we need to change anything in the guidance? The ALAC did not focus greatly on the guidance, but clearly there is one field, #3, that says, as part of the information, the registrar should consider using a standardized data element. And, obviously, if the result of the previous question is “The element must be used,” then this is no longer a

“consider.” So that’s just a minor edit on that. And I don’t know what happened to the screen.

Question 7 is a “not applicable” because they’re asking, again, for more information on the guidance and are there any legal or regulatory considerations that should be made/considered? And we are reiterating that NIS2—the proposed regulations within the European Union that relate to registration data—is ... Certainly, in my view, it’s not believable that the whole NIS2 [thick] concept will disappear. The details may change, but it’s quite clear that something in this area is going to happen. And, obviously, we need to both keep up with it and prepare for it to the extent that we can.

#9 is, should this guidance become a requirement to be enforced. Since it is guidance and since registrars or registries may find different methodologies to do it, the concept of enforcing guidance doesn’t seem to make a lot of sense—in my mind, anyway. Maybe someone else can explain it to me.

The next one is Recommendation 10. This is going on to the e-mail[,] I think—[one second]. Yeah. Question 10. “The guidance as written provides sufficient information/resources for registries and registrars who wish to publish a registrant-based registration e-mail address. If so, what’s missing?” And our answer is rather curt: “No, the report and additional information provided during [implementation] should give examples [in] best practices.”

The legal advice is convoluted at best and perhaps even somewhat conflicting. And it is a bit much to expect all registrars, including small

ones—some of them who don't have legal counsel—to be able to parse this and come up with recommendations. So we're suggesting that we do need more guidance on this.

And is there any additional input? Our additional input is pointing out that the webform that most registrars now use as a result of the Phase 1 recommendation, which said "Webform or anonymized addresses," is insufficient. Certainly, the form used by some of the largest registrars is not sufficient to actually provide communication. It provides a message, but the message says almost nothing and will be almost surely ignored and is certainly ignorable. And we're suggesting that something far more specific needs to be recommended. And if it's not consensus policy, then it's not going to be followed or not likely to be followed. This has been ruled out of order, out of scope, by the Chair, and the Chair has suggested this be remanded to the Phase 1 Implementation Review Team, who we know doesn't have the authority to address it. So we're just reiterating the same comment we made before.

And that is it. I open the floor to any questions.

And I see none. Therefore, I guess, Olivier, with your approval, we'll go on to the start of the second part of our presentation. And that is that Hadia will give a brief review of the SSAD, and then I'll go into the proposed advice to the Board on the SSAD recommendations.

OLIVIER CRÉPIN-LEBLOND: Thank you very much, Alan. I was just going to mention perhaps suggesting that ... I mean, I'm not obviously seeing any feedback on the

call today, but just yet another reminder to our colleagues on the mailing list for them to take a quick browse on this Google Doc.

When is the deadline for this?

ALAN GREENBERG:

The submission deadline is Monday. I'd like to have all input certainly preferably by tomorrow. I guess I could wait until the end of Friday, but certainly Friday is the absolute latest that we can take any input and incorporate it into the statement. So let's give people an extra day and make it until the end of Friday, and that will be it. At this point, we got very few comments initially, other than Hadia, who had done some extensive work on it. And I thank Hadia for that. But the rest of them were largely editorial. So I think it's probably close to being ready to go, but the Google Doc is up there and perhaps staff can send out a reminder to suggest people look at it and give them the final opportunity.

OLIVIER CRÉPIN-LEBLOND:

Thanks for this, Alan.

ALAN GREENBERG:

I'll turn it over to Hadia, correcting the spelling of my name first.

HADIA ELMINIAWI:

I am sorry for that. After this call, I'm sending another version.

ALAN GREENBERG: I've been called worse things.

HADIA ELMINIAWI: I am sorry. I thought maybe no one would notice, but it's there in the chat.

ALAN GREENBERG: Just a bit of humor.

HADIA ELMINIAWI: Okay. Should I take the floor?

OLIVIER CRÉPIN-LEBLOND: Yes, Hadia, absolutely. Please go ahead. Take the floor. I'm not seeing any hands up for the first part. So we're firmly into your camp now.

HADIA ELMINIAWI: Thank you. So Greg is saying, "Former professional proofreader." So, actually, Greg, I did notice it, but I did not have time to correct and resend. But I was just hoping that no one would notice. Anyway, apologies, Alan.

So I shall quickly take you through some background information about the system and how actually it works.

So if we could go to the next slide, please. So, first, it is very important to note that ICANN bylaws indicate that the provision of RDDS by registry operators and registrars are eternally within ICANN's mission. The

bylaws include maintenance of [inaudible] accurate and update information concerning registered names and nameservers. And this includes [inaudible] of third-party processing for legitimate and proportionate purposes related to law enforcement, competition, consumer protection, [fraud], security, resiliency, stability. All of this is actually included in ICANN's bylaws. So we are actually talking about a [inaudible] that is actually strictly within ICANN's mission.

If we could have the next slide, please. Again, this is just background information. [inaudible] that came into effect on the 25th of May. This was to go on for one year until the community comes up with a consensus policy. And the community was able, actually, to come up, with the EPDP Phase 1, with a consensus policy in relation to ICANN purposes for the collection of the data and actually also determine which data elements are going to be published and which data elements are not going to be published. And that what remains actually is to have actual for which the non-public registration data could be disclosed to third parties. According to the [temp spec set], until a unified access model is in place, registries and registrars will have to determine which requests are permissible under the law. So this is actually what is going on now or happening now.

If we could have the next slide, please. So, again, those are ICANN purposes for the collection of the data.

If we could have the next slide, please. This is the current collected and published data. So maybe we don't need to go through it. But this is just for your reference.

If we could have the next slide, please. This is Recommendation #5 from Phase 1, which actually determines which data elements are collected and generated, which data elements are required and which are optional. This is actually, when we talk about EPDP Phase 2A, where we think the standardized data elements should be. So it should be an optional field added to Recommendation #5.

If we could go to the next slide, please. So here's the SSAD that we're talking about. So I will actually explain everything on the figure. And then the following slides are actually what I'm going to explain now. So, actually, if a user wants to use the system to request non-public registration data, it has to be accredited. And there is a single accreditation authority. That single accreditation authority is ICANN Org. The accreditation authority could actually use third parties in providing its services. The third parties could include identity service providers. So the accreditation authority mainly actually verifies the identity of the user and provides credentials to the user of the system. That is like username and password and also some [assertions] related to the user.

After the user is accredited, it can use the system. So it starts by providing a request to the system, to the central gateway manager. Then that requires [inaudible] standardized form. So this is something different than what we have. So what we have now is actually a system where a requester would submit a request that does not have, really, a standard form. So the registrar could reply, "This is missing," or, "That is missing." So the process itself could take a long time. Also, some registrars never reply at all, according to some of the requesters.

So the central gateway will actually receive the standardized request form and will go ahead and check it if there is missing data. If there is some missing information, the central gateway manager will inform the requester that this data is missing and provide a period of time to the requester to update the request.

After the requester updates the request, the central gateway manager sends an acknowledgement reply with another reply indicating what are the next steps and when should the requester expect a reply from the registrar. Again, this is an improvement to what we have now because, as I said, some registrars just never reply. But then the problem is actually [inaudible] when, actually, the requester would receive a reply. So the central gateway manager provides the expectation of a reply depending on the service-level agreement. The central gateway manager is expected to be ICANN.

So, after the request is confirmed as complete, the central gateway will actually direct it to the relevant contracted party, relevant registrar. And the registrar will look into the request and then decide whether to disclose or not and reply to the requester. So this is actually what is happening now. So we have, I think, more than 1,300—maybe—registrars. So each one would look into the request in its own way and reply to the requester.

The central gateway manager could actually recommend whether to disclose or not, but the registrar is not obligated to follow the recommendation. And if it doesn't follow the recommendation, it should go back to the SSAD, to the central gateway manager, and explain

why it did not follow the recommendations in order to give an opportunity for the central gateway manager to learn and improve.

And then there is the automated path that was envisioned, but the only cases, actually, that go through this automated path are a few law enforcement cases and, like, the city field, which is, by definition, non-personal data, to start with, and also if the registrant complains. So we could say that there are no actual automated cases.

So, as the SSAD was envisioned to have more automated cases to maybe use sort of learning experiences and maybe, at some point, artificial intelligence as well, none of this is actually happening.

So if we could go to the next slide, please. The next slide. Yeah. The following slide again. The following slide. The next slide, please. Next slide. Yeah. Next slide. So I will stop here. How does the SSAD work? I will go to the priority levels and the service-level agreements. So, as I said, the system is expected to give a reply to the requester based on priority levels and service-level agreements. So Priority 1 is urgent requests, and then Priority 2 is ICANN administrative proceedings, and Priority 3 is all other requests.

Urgent requests. Those are requests limited to circumstances post an imminent threats to life and serious bodily injury. So these are really critical situations. ICANN administrative proceedings like UDPR and URS (Uniform Rapid Suspension) [...] And then comes all other requests. That includes phishing, malware, botnets—you name it.

If we could have the next slide, please. So urgent request. That's one business day, not to exceed three calendar days. So if you are submitting

the request to a registrar, maybe in Europe[—or] for the U.S., where you have Saturday and Sunday as a holiday—on a Friday, you could actually receive the reply on a Monday. And, again, we are talking about requests that pose imminent threats to life. So the calendar days are ... It's too much, right? It doesn't serve the purpose because, maybe when say, "This is too long (or too short)," it doesn't really make sense, but when we put into context and say, "Does this priority level serve the purpose?" actually it does not. It does not serve the purpose of urgent requests. Also, when we talk about phishing or botnets, if we're talking about five business days, that could extend to seven calendar days. Again, does this serve the purpose? Actually, it does not. So that's one of the major issues of this system: based on the priority levels and service-level agreements, it does not serve the purpose for which it was set.

If we could have the next slide, please? Yeah. Those are the cases for automation. And as I said, those are very limited cases, limited to the investigation of an infringement of the data protection legislation allegedly committed by ICANN or contracted parties affecting the registrant, the city field—again, this is, by definition, non-personal data—no personal data on the registration record that has been previously disclosed, and requests from law enforcement in local or otherwise applicable jurisdictions. Basically, confirm GDPR 61E lawful bases, and processing is to be carried under GDPR Article 2 exemptions. So those are very limited cases.

If we could have the next slide, please. So, for example, we were hoping that maybe ... Also, one of the things the SSAD is also suggesting is to have a standing committee in order to allow for this system to evolve.

But actually this, as defined in the recommendations, GNSO standing committee does not really have this flexibility. And if there are new findings based on more legal clarity or maybe new legislation or laws, this standing committee won't be able to adjust the system. So this system is not really agile or adaptable as we actually thought it would be. And we will actually need another PDP if more legal clarity is available or maybe new legislation is out there. Or even if we differentiate between legal and natural persons' data and would like to use SSAD, it's no clear that this would be possible without a new PDP.

If we could have the next slide, please. So the question, as you know is, does the SSAD provide a workable, active solution? Actually, it does not. So it provides a ticketing system. So the requester would actually have a standardized form through which he/she could submit the request and would know when he/she would ultimately receive a reply. But other than that, is it really serving the purpose? It is not clear that it is doing that. And as I mentioned, for example, if we do differentiate between legal and natural persons' data, would automatic disclosure of this data to SSAD be possible? It's not clear that that's actually the case.

So if we could have the next slide, please. So, basically, that's it. We wanted to refresh your minds so that, when we present the advice, you actually know what we're talking about. So I'll stop here. Thank you.

OLIVIER CRÉPIN-LEBLOND: Thank you very much, Olivier, for this extensive refresher on the SSAD. And the floor is now open for any questions or comments on this.

And whilst people are gathering their thoughts, I have one question on this. We all know that, in parallel to all of this, prior to the work of the expedited PDP on this gTLD registration data, there was a lot of technology work already going on with regards to a registration directory services set of controls, protocols, policies, etc. Is any of this work going to be usable in this SSAD? That's the first question.

The second question is, is any of this ... I mean, I gather some of the process will be automated. Is there likely to be any software that needs to be written from scratch or already existing to be able to implement all of that? I don't know whether you wish to answer that or—

HADIA ELMINIAWI: Olivier, if I may.

OLIVIER CRÉPIN-LEBLOND: Yeah, go ahead.

HADIA ELMINIAWI: Okay. So I don't really know the complete answer to your questions, but I definitely think that the RDAP as a protocol would be used, for sure. I think so. There's no reason to think otherwise.

However, on how the SSAD itself would work, I think there would need to be some kind of development of some, yeah, software. How complicated this is I don't know. Maybe Alan has a better answer. Thank you.

OLIVIER CRÉPIN-LEBLOND: [inaudible]

ALAN GREENBERG: Sorry. I'm just trying to find out where my microphone was. It was somewhere up around my forehead where it doesn't work nearly as well.

The answer is not an easy one. The SSAD is going to have to be ... There's no standard parts of it. It's all new, pretty much. We're presuming it's going to use RDAP protocol for a lot of the interactions, but there are some big unknowns in the process. The RDAP protocol is a query response protocol. We're in the situation where a person submits a question/query to the SSAD. The SSAD contacts the registrar or perhaps the registry. At that point, it goes into a never-neverland for some undetermined amount of time before the registrar is able to give a substantive answer. It will respond immediately to the SSAD, saying, "Yeah, I got your question." And, remember, the response almost surely has to go from the registrar/registry back to the original querent, not through the SSAD, because of border crossing issues. And the RDAP protocol is not designed for that.

So we don't really know how that's going to work. That's part of the investigation that's got to be done during the design of this. It's far from clear exactly how one is going to do it. Maybe, ultimately, the registrar will send a message to the person doing the query, saying, "Issue this RDAP query to me and I'll now give you the answer." But it's far from clear just how that's going to work.

OLIVIER CRÉPIN-LEBLOND: Okay. Thanks for this, Alan. Thank you.

ALAN GREENBERG: Yeah. I did have an off-topic comment. If we can scroll back on the slides to an early slide that had some dates on it, right near the beginning, whoever has control of the slides.

MICHELLE DESMYTER: I'm sorry, Alan. What did you need me to pull up?

ALAN GREENBERG: There's an early slide that has some dates on it—May 18th.

MICHELLE DESMYTER: One moment.

ALAN GREENBERG: I don't know the number. Somewhere right near the top. Scroll down to the top and then go down. It'll be easier to find. That one will do. Okay.

Just some insight into the ICANN processes. The temporary spec expired on the 25th of May, 2019, because it could last for only one year. At that point, we were stuck with a problem. The Phase 1 PDP issued its final report on the 11th of February of 2019. To believe that the implementation analysis would be done, and instructions given to

registrars, and registrars implement them all by the 25th of May, 2019, was just not at all realistic.

So Phase 1 included a recommendation that, essentially, using different words, extended the temporary spec for another year or so. And it extended it until the 29th of February, 2020—so, essentially, about a year after the deadline of the 25th of May, 2018. It was expected within that period—the one-year period from the time the report was issued until the 29th of February, 2020—that the GNSO would approve the recommendations, the Board would approve them, and ICANN Org and the implementation review would do its work, and the registrars would then be able to implement all of the things by the 29th of April, 2019. It is now almost a year-and-a-half after the 29th of February, 2020. We have not finished the implementation review yet, and we don't have a clue when that's going to finish. And, obviously, we have not issued any regulations to registrars and registries as to how to do it.

So just a little bit of guidance. We took what we thought was a conservative position of giving ICANN and the registrars over a year to implement Phase 1. We are now sitting at two-and-a-half years and running and it's not done yet. And, officially, since the 29th of February, 2020—a year-and-a-half almost—we are running without any policy. So it's essentially the wild west again, even though most people are being good and following the policy that they were supposed to be following anyway. But it just gives you some insight into how long and complex all of these processes are. That will bear some relevance in our next session.

Back to you, Olivier.

OLIVIER CRÉPIN-LEBLOND: Thanks very much for all of this, Alan. I don't know if Hadia has anything else to add, but if not, then I guess we can move on.

ALAN GREENBERG: All right. We're now going to look at the first graph that this group is seeing of the ICANN/ALAC advice to the Board on the Phase 2 recommendations: the SSAD. And we have a PDF that I sent in last night.

MICHELLE DESMYTER: This one, Alan?

ALAN GREENBERG: That is the one.

MICHELLE DESMYTER: Perfect.

ALAN GREENBERG: All right. The first part is basically introduction. If we can scroll down a little bit. We go into some detail—that's fine—of what the main issues are that we are calling the Board's attention to. You may recall that the Board is currently looking at how they should address the SSAD, trying to understand their—what's the term; something design phase—operational design phase, where essentially staff is trying to

figure out just what's involved, what the costs are going to be, and what the other issues are so the Board can make an informed decision on whether to go forward or not.

So the issues we're raising at this point are: the SSAD was created to allow legitimate access to non-public information; however, we don't believe that it's going to actually be able to that. The service-level agreements are too long. The hurdles are too high. There may be costs associated with this. And we don't believe it's going to work.

#2. Scroll down a little bit. The end result is that, because we are not going to be able to automate almost anything, almost every request will end up going to the registrar/ registry, who will look at it manually. So, although they will now have received the request through an automated mechanism, it's back to manual methods. And the only real benefit of going through this mechanism is that it is being tracked. So, if they simply ignore the request, as some registrars or some registries do, or if they take an inordinate time to get back, or if they say, "No, we're not going to give you the data," at least that information will be tracked. But other than that, we're building a very expensive system that it's not clear will deliver a lot.

#3. As I implied to the previous one, we're going to automate almost nothing. When we were deliberating this, it became obvious that, based on the recommendations for the SSAD, we would be automating almost nothing. But we had an interesting clause there saying that, as we understood the legal environment more, as we got information such as legal/natural perhaps, we would be able to evolve the SSAD so that it could start automating more processes and more requests.

The way that policy ended up ... We agreed to that, but when we started looking at how it would evolve, it turned out we are going to have to get GNSO approval, and the GNSO can say, "Hmm. That's going to require another PDP." We can't just approve it because contracted parties were saying, You can't change what we're obliged to just because some group says so." So we're then in the situation where the evolution would almost likely not having without another PDP. And that severely crippled it. And if there was a single deathblow to our supporting the SSAD, it was that one. We knew it wasn't going to work very well to begin with, but we had hopes that it could evolve in a streamlined way which wouldn't require years and years of PDPs. That did not come out to be true.

And #4 is we have a situation where the recommendations did not all receive consensus. Now, the concept of consensus varies from organization to organization within ICANN. Some organizations say you have consensus if no single entity objects. The GAC has a rule such as that. Other groups say consensus is unanimity. The GNSO has a consensus not too dissimilar from the ALAC's and says a significant number have to agree but there could be some outliers. And they actually have some definitions to define the various levels of consensus.

The SSAD recommendations had varying levels of agreements. Some were full consensus. Some were very large consensus but a few outliers. And some had literally no consensus whatsoever. That is, we were all over the map. And the GNSO Council in the past had never passed on a recommendation to the Board that did not have consensus—a strong consensus—of the working group. And that made sense, certainly in my mind, because, ultimately, if the Board approves these

recommendations, they become what are called, in ICANN terminology, a consensus apology and become binding parts of the contracts.

To have a consensus policy which is based on recommendations which didn't have consensus in the working group is somewhat curious, to say the best. It really questions why do we call it a consensus policy if it didn't have consensus. But that is the term we use. So we're in this unusual state and we're pointing out to the Board that they have to be really careful because, otherwise, we are adopting policy based on the lack of consensus. And that may not make a lot of sense.

#5 is legal/natural differentiation. We had hopes during the Phase 2 process that we would address, and, ultimately, we said, if it's not going to be addressed, it has to be addressed soon after. And that was in our ALAC minority statement. And, indeed, the GNSO has chartered the Phase 2A to address it. It now is becoming pretty obvious that there is no way we are going to agree on formal legal/natural differentiation. That's just not going to happen in any reasonable outcome from the Phase 2A work that's going on. And the fact that that will not happen makes the whole concept of the SSAD that much less practical because, if the SSAD does not know that something is legal/natural, it has no basis on which to make automation recommendations. So the hope at that point was that we would make a recommendation saying legal/natural differentiation was required, and the SSAD would have to honor it. That hasn't happened.

So all of that put together says we are not very satisfied with the SSAD. We believe that, if ICANN goes ahead with it, they will spend a huge amount of money and end up with something that is practically not

likely to be very practical and, because of the costs associated with it, since part of the recommendations say the users must bear the cost of it, would be very high.

We got an inkling of what those costs might be. Ignoring all of the software development for the SSAD, one very large registrar has recently come up with a practice by which they will disclose information comparable to what the SSAD was designed to do—that is, receive requests, evaluate them, and perhaps disclose. They're charging \$50 U.S. a shot. And that's not a guarantee you get the information. That simply allows you to ask the question. At those kinds of costs, this just isn't going to fly. So that's where we stand.

So, at this point, the draft version gives three steps of advice to the Board. Next page. If you scroll to the next slide, please, or next page. The first one is to either reject the SSAD recommendations or remand them back to the GNSO, perhaps with a suitable delay to fully understand the potential change to the GDPR-related regulations in Europe. That's NIS2.

#2. Immediately have ICANN Org design and begin implementation of a ticketing system to track responses and disclosures for non-public registration data. Such a system really has no need for accreditation since we already established that registrars may ignore that completely. And that's a very large part of the costs associated with this and simplifying the overall procedures. And if the Board believes that a PDP is required to force contracted parties to use it, they should initiate a targeted PDP to that effect. And they should also consider having the

ticketing system apply to privacy proxy providers so we can track their usage, their release of private information as well.

And, lastly, should regulations comparable to those related to data registration information, and NIS2 be adopted by the European Union council and parliament—notice we’re saying “by adoption by the parliament,” not “national regulations,” which make take another year after that—the ICANN Board should consider initiating a targeted PDP to ensure that all ICANN registrars are subject to comparable rules. If we don’t do this, we have a situation where those registrars subject to European law will have to do the differentiation but those in other jurisdictions will not. And they can become havens for organizations or entities that want to register domain names without the differentiation, therefore keeping all of the information confidential.

And that’s where we stand right now. We don’t have a formal deadline but we would like to get this issue in the next, hopefully, few weeks. It will be [pasted] on a document following any comments that come as a result of this meeting. And I’ll be publishing that Google Doc. And we’re looking for input. This is a draft, so it may undergo significant change as both Hadia and I review and as we get input from other people involved in this process within At-Large. So this is not necessarily anywhere near a finished document.

Our intent is to try to keep this short and sweet. There’s a temptation to go in too much length, but I think, since the Board is obliged to come back to us to investigate, we can provide further details as we go ahead. We just want to make sure that what we’re presenting is really

crystal-clear and is something that can be understood both by the Board and by others.

And, with that, I open for questions. And I see Steiner has his hand up. Olivier, do you want me to handle the queue, or you?

OLIVIER CRÉPIN-LEBLOND: That's fine. You can handle it, Alan. Thank you. So it's Grøtterød.

ALAN GREENBERG: Okay.

STEINAR GRØTTERØD: Hi. Thanks, Alan, for explaining the introduction of the presentation. I have a question because I kind of remember that, the first time we were talking about the RDDS, it was a big discussion. At that time, I was working as a registry operator. The idea was to have tiered access. The way I understand these things now is that you have to be accredited, but does that accreditation also kind of set a level of information that you should have if you are being accredited? Because I recall that law enforcement should have more detailed information than intellectual property owners, etc., as an example. I'm not saying that's the correct one but it's as an example. Is the same philosophy been displayed in this process? Thank you.

ALAN GREENBERG:

There's a couple components to that answer. First of all, there aren't all that many fields that are being redacted. We have a few fields giving the name of the registrant and the contact information—street address, phone number, e-mail—and perhaps an e-mail and phone number for the technical contact. So there's not all that much information.

But that being said, the whole concept of the SSAD said you must request only the specific fields you have a real need for, and the registrars is only allowed to release the fields that they believe you have a need for.

Now, whether that is aligned with what your accreditation is or not is interesting. Certainly, if you're law enforcement, I would think you'd have a good case for saying, "I want everything." If you're an intellectual property owner that says, "I believe this domain is violating my rights," maybe you don't have a particular need for the street address, for instance, and maybe that isn't given. Maybe you do need a street address because you need to cite it in a court document. I'm not sure.

But the bottom line is, yes, we do have to differentiate between what the fields are and who gets what. And the accreditation that you have—that is, as law enforcement, as intellectual property, as cybersecurity—may have some effect on which fields you should ask for and are given, but the registrar/registry has an obligation to evaluate your real name, even if they understand what your accreditation is.

So the accreditation may play into this, but it's not 100% clear to what extent it will play into it. I hope that answers the question, but if not, feel free to try again.

STEINAR GRØTTERØD: [Yeah, it did]. Thank you very much. May I have a follow-up? I see there's no other hand up.

The second thing is that, if you are accredited, are you accredited for a certain amount of time, a certain amount of request, or is there some sort of a limit per registry operator, etc.?

ALAN GREENBERG: To be determined.

STEINAR GRØTTERØD: Okay.

ALAN GREENBERG: That's a simple answer. It is conceivable that you could be accredited for an unlimited number of requests. It is more likely that you will be accredited and then have to pay per request by a bundle of 100 requests or something like that. So there will be a free structure because the ongoing must be largely covered by the users, but at this point, we have done nothing. The PDP was not looking at that level of detail to say what the structures would be, other than it may well be flexible to cover the needs of the potential users.

So you may per request. You may per bundle. You may have unlimited access. It's going to depend on far more variables that we have any handle on right now.

STEINAR GRØTTERØD: My last question, if that's okay, is that, very often, an example has been used where Interpol will have one access for all the members of the Interpol community or society. Is that still the idea? Or will [inaudible]?

ALAN GREENBERG: It's not fully clear. We certainly are talking about organizations being accredited, but on the other hand, we also want to be able to trace a query down to a specific individual, in which case the organization would have a responsibility for identifying who it is that's using it at any given time. And they would probably need some level of their own credentials. Again, that is not something we've gone into other than to say we need to be flexible—that is, there may be individuals that are accredited, but certainly organizations (be it law enforcement or Microsoft) are going to require accreditation. And clearly that will involve access by more than one individual.

So the bottom line is, yes, all of the above.

STEINAR GRØTTERØD: Okay. Thank you. Thank you very much, Alan. Thank you.

ALAN GREENBERG: Hadia has her hand up, I guess, to answer some question but maybe to ask one.

HADIA ELMINIAMI:

So I was going to put it down. I think you answered everything, Alan. It's just in relation to the accreditation. I think when we actually reach that accreditation it's for a period of time. But would you be accredited for a specific period of time and also pay for requests? We haven't actually discussed how payment would happen. Is it per request plus accreditation, or does the accreditation include the request? We haven't really discussed all of this. Thank you.

ALAN GREENBERG:

Remember, the PDP determines policy. These were surely decided to be implementation other than to specify that we need to be flexible.

I see no more hands, Olivier. If that's it, then I encourage people to look at the Google Doc once it's up, make any comments or suggestions, and we'll proceed from there. We will certainly be bringing this back to this group at last once more, possibly more than that.

John McCormack adds a comment saying, "If we change \$50 a request, the SSAD could be more commercially viable than many registries."

The bottom-line is we're not allowed to make it a profit center (#1), and (#2) charging \$50 only makes you successful people who are willing to pay it. And it's far from clear how many people are willing to pay \$50 for a request.

Olivier, back to you.

We can talk about the spelling of my name for a while if we have nothing else to do. Have we lost Olivier?

MICHELLE DESMYTER: Olivier, if you're speaking, we're not able to hear you. You should be still connected. We have Adigo checking his line.

Okay. Actually, I think we'll have to dial back out to him. If you could please stand by for just a moment.

Okay. It looks like we're going to have to redial him. So it'll be just a moment before [we get him on].

OLIVIER CRÉPIN-LEBLOND: Thank you so much. Thank you for the updates and all this, and apologies for the technical problems. [It's] rather late here.

No further questions from anyone on this, and we have some time back.

I did have one question, actually, on some of the points being made here. There's frequent referring to "ask the Board to send back to the GNSO Council," but we've already seen we've reached Phase 2A. Is there any chance that, by sending it back to the council, there's going to be any final result that's going to be any different from what we've already got now?

ALAN GREENBERG: I guess I can answer that. If it gets remanded to the GNSO, which is one of the options that could happen if the Board chooses not to accept the recommendations, they can just reject them out of hand. They can

discuss it with the GNSO. The bylaws allow for a number of options at that point. The Board can't change the recommendations itself.

OLIVIER CRÉPIN-LEBLOND: I can hear some [inaudible].

ALAN GREENBERG: Yeah, sorry. The Board can't change those recommendations itself, but they can remand back. Now, whether that remanding back would have any effect, any real benefit, or not, or whether the world would have changed by then, I have no idea.

OLIVIER CRÉPIN-LEBLOND: Okay. Thanks for this. We will find out in due course.

Seeing no further hands on this topic, then I think we can probably close off on the policy on the work group updates and move to the policy comment updates now. On this occasion, neither Evin Erdogan nor Jonathan Zuck are with us. I'll quickly take you through the two currently upcoming public comment proceedings for July, one being the proposal for the Japanese script root zone label generation rules, something that we sent usually to our IDN Working Group, along with the similar one with Greek script label generation rules. So we'll certainly have the IDN Working Group look at these.

There was a recently ratified statement that was drafted and sent, and that's the Registrar Stakeholder Group draft white paper: Registrant Protections in DNS Abuse Mitigation. And there is a public comment

that has reached us for decision on what we wish to do about this. That's the proposed renewal of the .aero registration agreement.

I know that Justine has appeared to have joined us—Justine Chew. I'm not sure whether you wanted to opine on this at this very moment. Justine Chew? And I know she hasn't got around to looking at the proposed renewal.

JUSTINE CHREW: Exactly, yeah. Sorry, I've been very busy with other things.

OLIVIER CRÉPIN-LEBLOND: Are you planning for next week? Because there is an action item that speaks about the 28th of this month. So it's likely to be maybe for next week or the week after.

JUSTINE CHEW: As discussed, I think, last week, I did say that I was going to offer to review it, but I may not have the time in the next two weeks. So I think that's why the date appears as it is. But I also agree with Jonathan that, in the meantime, if I manage to get some time to look at it, I would just send a quick note to the CPWG list to say whether we need to look at it in more detail or not. So I think that's where we're at. Thanks.

OLIVIER CRÉPIN-LEBLOND: Okay. Thanks very much for this, Justine. And just as a reminder to everyone, the .aero is one of the so-called legacy top-level domains, the

ones that were implemented in the first few rounds of TLDs. And it was in one of the batches that was included in the—I can't remember the date but between the 2000 and 2010 round of expansion, along with a few others. The default is for the ALAC not to comment on these, except if there's something that really comes out of the ordinary and might set a precedent, actually, for other registries and other registry agreements as well.

The public comments that are currently in drafting. Well, of course, we've just heard of the initial reports on the expedited PDP on the temporary specification for gTLD registration data. You have the link that is here.

It's funny. It does say the public comment closed on the 19th of July. Hasn't that changed? Because that's the public comment for us, isn't it?

Alan, perhaps? If you're still on the call.

ALAN GREENBERG: If it's changed, I'm not aware of it. I just went to the public comment page earlier today and it still says the 19th.

OLIVIER CRÉPIN-LEBLOND: Right. So then you did say you wanted input as early as possible on this.

ALAN GREENBERG: I said no later than this Friday, two days from now. The 19th is Monday.

OLIVIER CRÉPIN-LEBLOND: Right. So just checking then there because obviously if you plan to finalize it by this Friday the 16th, will the ALAC have the time to vote on it by the time it will be sent? Or is the plan to have it sent [to] the ALAC, pending ALAC ratification?

ALAN GREENBERG: The latter.

OLIVIER CRÉPIN-LEBLOND: Okay. Thank you. Then of course—

ALAN GREENBERG: I mean, unless we have some indication that the ALAC might reject it, I think we'd like to get it in on time. And I've had no indication that we may see a rejection of this. So that's the normal way that we've been doing things, and I presume Maureen has to agree. But I'm not expecting anything other than that.

OLIVIER CRÉPIN-LEBLOND: Yeah. Thanks very much, Alan. Indeed, in order to maximize the amount of time provided for everyone to comment and on such issues where the ALAC is not expected to be rejecting the advice, it's common practice that the statements are submitted pending ALAC ratification, which is then—

ALAN GREENBERG: If we pull it back, it takes time for the staff to analyze the data. So if ever had to pull it back, we could, and it would be taken into account in the analysis. So that's not a major issue. But just to be clear, I said we could accept comments until the end of Friday and I will finalize over the weekend. So it gives people an extra day.

OLIVIER CRÉPIN-LEBLOND: Thanks very much for this, Alan. Then of course there's the second statement that's listed on the table, and there's the ALAC advice to the ICANN Board on the EPDP Phase 2. That's still marked as being [in] drafting.

Is there anything you'd like to say on this?

ALAN GREENBERG: Yes. I think I said there's a version on the wiki right now and, following this meeting, I will post it in a Google Doc and make that Google Doc address available.

OLIVIER CRÉPIN-LEBLOND: Super. Thank you. I'm not seeing any hands up on any of the policy work that is taking place here. Of course, everyone is invited to have a look at the usual policy pipeline that is linked from the agenda.

We can now go to Agenda Item #5, and that's Any Other Business. There's an announcement here, and that's about the APRALO (Asian, Australasian, and Pacific Islands Regional At-Large Organization) webinar on the Internationalized Domain Names (IDNs), focusing on advancing

the IDN agenda for more inclusive Internet. That's on Tuesday, the 27th of July, at 08:00 UTC. And of course, although this is an APRALO webinar, as you know, you can join in from any of the regions. You just need to registrar as we now do with webinars so as to have a good on the numbers of people that will be attending. That's one thing that we would certainly recommend for those people that are interested in internationalized domain names, those domain names that use non-Latin character sets.

Are there any other announcements under AOB?

And we have Justine Chew.

JUSTINE CHEW:

Thanks, Olivier. Just on the APRALO webinar on IDNs, I posted the link to the agenda in the chat. It's also hyperlinked on the CPWG agenda wiki. I believe staff is finalizing the link for the Zoom room registration. So if you don't mind just waiting a couple hours for that.

But in the meantime, I'd invite people to go and have a look at the agenda. We've taken pains to structure the agenda in such a way that it is meant to be introductory. So anyone who is interested in learning about IDNs is most welcome to join us. I'm not sure about the timing for your particular region because this is an APRALO event, so we're looking at timing more for our region and also to accommodate the two speakers that we've secured who are very highly respected experts in the area of IDNs. They are Emily Taylor from Oxford Information Labs, and Sarmad Hussain. The webinar will be moderated by Satish, and I will have a little say in it as well. Thank you.

OLIVIER CRÉPIN-LEBLOND: Fantastic. Thank you very much for all this information, Justine. Very helpful.

And just one question. That will be ...

MICHELLE DESMYTER: Olivier, I think we lost you.

OLIVIER CRÉPIN-LEBLOND: ... So that's a bit of a tough one [inaudible] out of the call. Can you hear me on this side?

MICHELLE DESMYTER: Yes, we can hear you.

OLIVIER CRÉPIN-LEBLOND: Okay, excellent. So now I've switched on to Zoom, and Adigo doesn't need to call me back, hopefully, until Zoom crashes as well.

I was going to ask: this will be recorded as it always is?

JUSTINE CHEW: Yes, it will be recorded. And I should mention that it has been organized in preparation for the EPDP on IDNs as well. Thank you.

OLIVIER CRÉPIN-LEBLOND: Okay. Thanks very much for this.

Any other Other Business from anyone? Any announcements?

I am not seeing any hands up, so that means we just have to check when our next meeting will take place.

MICHELLE DESMYER: Hey, Olivier. It's Michelle from staff. We're keeping with the rotation: next Wednesday, the 21st of July, at 13:00 UTC.

OLIVIER CRÉPIN-LEBLOND: 21st of July already. Goodness. Time is flying fast. 13:00 UTC. I think that's our usual rotation. And I'm not seeing any immediate clashes. Of course, it will be a bit difficult for some people, but that's all we have. So thank you very much for this.

Seeing no other hands up, I think we can end the call with a few—

SÉBASTIEN BACHOLLET: Just to say that NomCom is meeting at that time. Therefore, [inaudible] will not be with you.

OLIVIER CRÉPIN-LEBLOND: Okay. Thank you for this, Sébastien. And I'm sorry that that's the case. I guess NomCom has a pretty hard week. If I understand correctly, there's—

SÉBASTIEN BACHOLLET: Yeah, but if you put it two hours earlier or if you keep it at the same time ... But this week, we [won't] be able to participate. But that's up to you. Thank you very much.

We can't hear you, Olivier.

MICHELLE DESMYTER: You're cutting out, Olivier.

OLIVIER CRÉPIN-LEBLOND: Yeah. Well, this is exactly why I'm trying to use the other thing.

UNIDENTIFIED FEMALE: We lost Olivier again.

UNIDENTIFIED FEMALE: We did.

OLIVIER CRÉPIN-LEBLOND: [inaudible] clash with NomCom.

SILVIA VIVANCO: We couldn't hear you, Olivier.

OLIVIER CRÉPIN-LEBLOND: I'm going to kill myself. Thank you. I was going to say ... Can you hear me now?

SILVIA VIVANCO: Now, yes.

OLIVIER CRÉPIN-LEBLOND: Okay. Would we be able to avoid clashes?

ALAN GREENBERG: I think Olivier is asking staff, would it be possible to know what the NomCom schedule is in the future so we could avoid clashes? I think that's what he said.

SILVIA VIVANCO: Okay. We are going to take note of that, Olivier, and check with staff.

OLIVIER CRÉPIN-LEBLOND: Okay. Thanks very much. In the meantime, we'll ...

SEBASTIAN BACHOLLET: NomCom is meeting from 1:00 P.M. to [9]:00 P.M. each day next week. Thank you.

OLIVIER CRÉPIN-LEBLOND: Okay. Thanks for this, Sébastien. So maybe we might wish to just ... In order to avoid this, we could try and have an evening call next week. So same time as tonight.

SÉBASTIEN BACHOLLET: Will be great. Thank you.

MICHELLE DESMYTER: Okay So 19:00 for next week? Same time?

OLIVIER CRÉPIN-LEBLOND: Yeah, indeed.

MICHELLE DESMYTER: All right. I'll go ahead and send off the invite shortly.

OLIVIER CRÉPIN-LEBLOND: Thank you so much. Let's do that so that we avoid the clashes.

Thank you, everyone. Apologies for the terrible thing. This is why I ask for an Adigo dial-out. But have a very good morning, afternoon, evening, or night, wherever you are. I'm hoping you were able to hear my last message. Thank you, and thanks to our interpreters and to our staff and to the real-time text transcriber. Thank you and goodbye.

[END OF TRANSCRIPT]