

---

ANDREA GLANDON: Good morning, good afternoon, and good evening. Welcome to the Registration Data Policy IRT call being held on Wednesday, the 19th of July 2023 at 19:00 UTC. Attendance will be taken by the Zoom room. I would like to remind all participants to please state your name before speaking for recording purposes and to please keep your phones and microphones on mute when not speaking to avoid any background noise. As a reminder, those who take part in ICANN multi-stakeholder process are to comply with the expected standards of behavior. And with this, I will turn it over to Dennis Chang. Please begin.

DENNIS CHANG: Thank you, Andrea. Welcome, everyone. This is truly an important meeting for us, and I hope that we can be productive. Just to remind everyone, we are meeting to talk about urgent requests. That is the one topic and the only topic we have for this meeting. And this is a 90-minute session, and we have purposely designed it as a 90-minute so that we can have ample time for everyone to speak and talk about the topic and share ideas and explain, ask questions fully as we need to. So let me see if I can share this screen. I'm trying to share the IRT workbook.

To remind everyone, we are talking about the EPDP Phase 1 policy language that has this recommendation language. And then we have a definition that IRT fully supported, so there is no longer in question, that has been set. And we have a proposed policy language that we are looking at as a baseline.

---

*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.*

---

Now to further remind going back, and you'll hear this from the IRT member during the conversation, that there has been other language or requirements that were under consideration. One, what we call the public comment version, and that is a two-business day requirement. And post public comment version, that we changed the two business days to 24 hours. And then after receiving IRT comments and feedback, we have now changed our baseline to one business day, not to exceed three calendar days. And at our last meeting, I have provided ample, I think, reasons why we have chosen this particular requirement as a compromise position. And we were looking for support. And we got feedback from the IRT that IRT would like additional time, more time, to talk about and discuss possible other alternative solutions. And we decided that it was worth having another discussion. And I expect really this to be our last time we talk about this. And in my email, I wrote to you that hopefully we'll come up with some language that all implementation team, including IRT, of course, can support. If not, our baseline of one business day, not to exceed three calendar days, will be set as our policy going forward.

Now furthermore, I have to say this to set your expectation. So it's our belief that community makes the policy, and ICANN Org is charged with implementing that policy. So when the community with their PDP working group comes forward and ask us to create a requirement, we do not see that as policymaking, but implementing the policy. And wherever we can, we look for requirements that have basis in some community agreement. And as I mentioned, this one business day, not to exceed three calendar day, was found to be the one and only documented evidence where cross-functional, cross-community team

---

come together, had ample time to discuss it in the EPDP phase two, and agreed on, at least supported, and that was documented in the final report, and it was approved by the GNSO Council.

Now, mind you, it's accurate to say we have [not] a board approval for this recommendation, but I think the point here is that from the ICANN Org's perspective, it's a good requirement that has proven to gain support from all sides that participated. So we will start our discussion, and I see a couple of raised hands already. And I will start with Steve. Hello, Steve. I see you have your video on, and that will encourage me to turn my video on. There you go.

STEVE CROCKER:

Thank you very much, Dennis, and I have continued to appreciate your strong hand at trying to manage this process. I raise my hand at this point specifically because I see Becky is on the call. And Becky, I've noticed that you've tended to participate for a period of time and then move on, which having spent time on the board, I can easily understand the multiple pressures. But I wanted to take this moment to share with you a perception which is simply that we are in a very awkward position that it's likely that if this goes forward along the lines that Dennis has outlined, that it's going to bubble up to the council and then bubble up to the board, and you're going to have a mess on your hands. It's the short thing. And I wanted to say that clearly and explicitly. And so the obvious message is prepare for that. It's a substantive issue. It will be a political issue. It will be a public relations issue as well.

---

To speak very briefly on the substance, so Dennis, the set of alternatives isn't—you didn't include the other ones that have been discussed here about immediate access, about keeping records and so forth. But the source of the problem is there in vivid color that a definition of urgent request that relates to threat of life, serious bodily injury, etc., cannot, must not, makes no sense to be in juxtaposition with response times that are measured in days. You're talking about things that are urgent. It would just be like calling the fire department and saying can I make an appointment for you to come and put the fire out sometime in the next 24 hours. It's just not meaningful. And no amount of adherence to process or prior agreements changes a fundamental fact like that. So that's the underlying essence. And we seem to be, as best I can tell from the lead up to this meeting, at loggerheads. And there's a good fraction of the people in this group who seem oriented toward driving toward a conclusion that makes no sense on the surface but checks the boxes of having followed the process and therefore get to declare success.

So that's the message I wanted to convey. And under the rules that we've long appreciated of no surprises, I wanted to make sure that there's good communication about this sort of thing. Thank you.

DENNIS CHANG:

Thank you, Steve. Yeah, I captured that as 1.5. I will just simply call it IRT suggestion. It's a concept with the requirement is immediate except without timeline limit is what I would call it. I think conceptually that's what you were recommending. And you're not the only one, actually, who thinks this way. I have heard this suggestion and received this suggestion privately when I was in ICANN meeting last that there are

---

other people who believe this is the right way to implement this. And next, Sarah, go ahead.

SARAH WYLD:

Thank you. Good day. So first of all, to the ICANN proposed text, which is sort of yellow in that box. No, that's -yeah, that one. I think that that proposal misses important aspects of both the phase 1 and phase 2 recommendations that it's attempting to bridge.

So for the phase 1 recommendation, in comparison, this is not a number of business days. The cap here is three calendar days. So it just doesn't implement the recommendation. And if we think of the phase 2, it does not include the percentage thresholds that we talked about last time, which I honestly don't really know how that would be feasible to include in this direct to registrar request process anyways. So I don't think that this is a successful compromise choice. And I don't recall having seen any support for this either from the registrars or other teams, which it's possible that I've forgotten, but I don't think I've seen support for that.

And to Steve's point about urgent requests requiring an immediate or instant response, it really doesn't matter what I think about this or whether I agree or whether anyone else agrees to it. It raises the question of whether the policy recommendation is itself flawed. And if that's what we're going to discuss here, then I imagine that that has to go back to the PDP working group. I don't think that we can make that big a decision. So thank you.

---

DENNIS CHANG:

Thank you, Sarah. Just to make a point here, you're absolutely right. If we view this as a flawed or a recommendation that needs to be further clarified and otherwise it cannot be implemented, then we should send it back to the GNSO. And I believe Seb is here for -everybody knows, right, Seb is our GNSO liaison whose role is to do exactly that. When he sees something of that nature, he can initiate on his own. He's a direct channel to GNSO where he can come back with GNSO advice on the language itself.

What we have done for the past years, and this team is really, really good at this, and I think it's the first time I've seen us doing something like this at implementation, is that we have created what we call a drafting errors and implementation interpretation. We have captured about a dozen things that we have, in fact, has done an implementation that is not in line with the recommendation, and we provided for transparency exactly why we thought that, and we published that for the public comment. And as you know, that mechanism was very successful, and we were able to continue our implementation without having to go back to GNSO council each and every time.

So remind you that we do have that vehicle. So I wanted to thank you for the reminder that you are giving us, that in turn, we do have a way to go forward. Now next is Thomas, go ahead, Thomas.

THOMAS RICKERT:

Hello. Hello to everyone. I'm just coming back from my vacation, so I'm still trying to catch up, and I hope that I don't say anything that's been discussed on the list already. Now we are talking about law

---

enforcement requests, and from a GDPR perspective, it is far less risky for a contracted party to disclose personal data in civil matters than in criminal matters. So the GDPR is structured in a way that it is harder for disclosure, to make disclosures, because the impact on the data subjects concerned is much more severe. You know, in civil cases, you might face a civil lawsuit, but in criminal cases, it might lead to convictions and prison time or even worse.

So that means that domestic law enforcement can require the data based on 6.1(c), so they have a legal basis for the disclosure or to ask for disclosure. And I guess that's not really the big issue that we're talking about. The big issue is that we're talking about a global environment with a plethora of different jurisdictions. So the disclosure has to take place based on 6.1(f), i.e. when there's a legitimate interest outweighing the interest of the data subject. And that typically requires a legal assessment. And the question is, can the contracted parties that are approached obtain that legal assessment and make that assessment within 24 hours? You know, as a lawyer, I'm working with a lot of contracted parties. And what I do know is that they work as quickly as they can on urgent matters, and they will not procrastinate. And if the fear is that they might procrastinate, we already have that language in the proposal, because undue delay means you have to take action immediately. You must not procrastinate. That's what it says. So if a contracted party tries to delay things, that they can't do within the boundaries of the language that we have put out for public comment.

Then the other thing is that in the emails that I saw, some reference has been made to DNS abuse. And I think the DNS abuse scenario is what Steve mentioned. You know, when there's fire, you call the fire brigade

---

---

and ask them to take action. But those are instances in which a support team member working with the registrar or with the registry can see, in most cases, whether there's smoke or there's fire. So that's something that they can relatively easily respond to without asking for additional information to be able to assess the interest of the data subject or the requestor. And they might not need to obtain legal advice. So I think that's a complexity that we just have to acknowledge.

And the question is, how do we deal with that? I think we can hopefully agree that we're looking for responsive contracted parties that are willing to take a look at matters instantly if there is an emergency. Yet we do not want the contracted party to make flawed decisions based on 6.1(f) that might harm the interest of the data subject, that if the decisions are bad and maybe even are contested in court, that might damage the reputation of that contracted party, and that might harm the reputation of ICANN offering the system for disclosure. So we want good decisions in a fast fashion.

Now how can we achieve this? I think that we pretty much have the tools at our fingertips already, because one fact that I think is not highlighted enough in these discussions is that there is already a requirement for a registry to have an abuse point of contact, an APOC, in place. That person even needs to publish a phone number and an email address. And that's a contact that's constantly monitored. So that is a direct path to a registry operator.

For registrars, and I guess it's 3.18.2 of the RAA, we already have a requirement for registrars to respond to urgent requests within 24 hours. Now you might say we already have the 24 hours there, why



---

can't we use that for other purposes as well? But that's exactly the smoke and fire, fire brigade versus weighing the interest scenario. You know, you have different tech teams, different types of expertise working on those different things. But what I'm trying to convey is that there is a direct route to bring urgent matters to the attention of a registrar and a registry already. And I'm sure that they will do what they can in order to respond as quickly as possible, not even exhausting the 24 hour time period that we're talking about.

So in my view, we have the tools in place. The question is, is an additional safeguard or is an additional mechanism required that would require the contracted parties to completely restructure their handling of incoming queries and my take on it is that we shouldn't bend this too much, that we should go with the proposal as put out for public comment and not make the contracted parties run the risk of ICANN compliance going after them if they slip over slightly. I think we can trust them to be as quickly and as efficient as possible for matters that really require the urgency that's been claimed here. Thanks.

DENNIS CHANG: Thank you. Beth.

BETH BACON: Yeah. Hi, Dennis. Hi, everybody. This is Beth Bacon. I will agree with Thomas. I think that per our discussions on the last call, it was made clear, I think, by some of our law enforcement friends that the concern here is for registrars that aren't on this call, people who are not cooperative. However, the ones that are on this call are saying this

---

won't work. So it's going to impact those who are already cooperative and willing to make this work and willing to—already doing things that are not in policy. For example, law enforcement can gain access from many registries and registrars, have great contacts. We respond immediately. But if we changed this, it would punish them because they would be constantly in fear of compliance because the time is so short. However, most of these things that are urgent, as is described, we went through all of this for many, many, many months, if not years, a, defining what an urgent request is under this policy. It doesn't have to be the same as every other place in ICANN. But under this policy, this is what this means as decided by the PDP and the IRT.

Anything beyond this, I can almost guarantee that someone is going to get a court order. They're going to call me and say, "I have a concern. Can you help me?" Yeah, sure I can. So I think that this, as we, as was defined, this is to be a catch for those registrars and registries that are not as cooperative, as active. And I think that this type of the, the language that went out for public comment is sufficient that it would get, it would be able to provide an actionable point for compliance on those irresponsible registrars and registries or just non-responsive or irresponsible, whatever you want, whatever you want to label it. I have huge concerns that we are talking about at this late game, one edit, one change, sending this back to a PDP that has disbanded. This policy has been considered and the IRT has done, I will say the folks on this call have been so consistent and so engaged for so long. And we have worked through so many hard things. The fact that we're talking about sending this back because we can't find a compromise is very sad to me. I think this represents a concern for if we can't work this out, if we can't,

---

maybe as I said before, go back to what was had enough of a consensus to go out to public comment. I mean, if we, if we agreed then, I mean, and can agree now, if there's an edit, I think that that just shows that we are using the IRT to re-litigate things. And that is what everyone says no one wants.

So again, I just support what Thomas said. I do think that an option here is to go back to what we published in the public comments. There was enough consensus, if not perfect, there was enough consensus to get that out the door. Instead of trying to just create a new process or recreate new policy that was not necessarily agreed or create something that is not in line with the recommendation. So I just, just wanted to put those points out there. I do support the fact that we did have existing language and that is an option before we start thinking about sending things back to the GNSO, which makes my brain explode.

DENNIS CHANG:

No, no exploding of brains, please. I'm trying to read some of the chats that's happening on the side here. I wasn't paying attention, but if you would like to raise your hand and speak so we can hear you as well, that would be good. Lauren.

LAUREEN KAPIN:

Thanks. So first of all, I appreciate everyone's sustained attention to grapple with this. And it's definitely challenging. I know that there's a lot of talk about re-litigating and what achieved consensus. But I also want to point out that I think perhaps has gone to a little bit of the sidelines is that there was a public comment process here and Org staff decided

---

after analyzing those public comments that the right place to land was 24 hours. And I'm mindful also that at least that part of Org, which I know was a group specifically tasked with this evaluation, I'm also mindful that Dennis has subsequently come out with some other proposals based on other reasoning.

I think all this underscores that there's a lot of different perspectives and thinking and analysis here. And I think everyone has heard the concerns on either side. I'm certainly cognizant of the fact that contracted parties don't want to be in a position where they're risking action by ICANN compliance or external liabilities because of potential privacy law violations. So I do totally understand that.

At the same time, I know that that it's been challenging for your law enforcement colleagues to be dealing with a very narrowly defined set of circumstances, which as Steve put it, are akin to a house being on fire and being told that this response time needs to be something other, at least that in our view, doesn't match with the nature of something urgent. And I think that's why we had proposed some sort of combination outcome where you could have a 24 hour timeframe for most requests, some sort of provision for extenuating circumstances, which I think Roger had proposed to define. And this is in Roger's July 10th email, which I think spoke for the registrars or on behalf of the registrars, some sort of extenuating circumstances, which could mean complicated requests or a situation where a contracted party is faced with many requests that in that scenario, there could be some latitude to make a request to extend the time period. And actually when I was looking back at Roger's proposal, that seemed to me to be the proposal that was at least closest to something that could be massaged to

---

perhaps find a way through here because it had that wiggle room. And of course we've also discussed other ways of providing a little more breathing space, such as adopting the service level requirements that were part of the phase two recommendations.

So I would love for us to be able to perhaps look back at Roger's proposal to see if there's a way we could see if there's a way we could get to yes, looking at that more closely, that would be a proposal from me for this call. I would just love for us not to be reflexively bound to, as they say, as the argument in Fiddler on the Roof, horse mule, horse mule, just going back to the same yes/no arguments that we keep having.

DENNIS CHANG: Thank you. Steve?

STEVE CROCKER: Thank you. I was going to clear away maybe a couple of pieces of misconception here. I don't think there's anything that's been said that suggests that changing the definition is part of the discussion. So all the comments about that definition was decided upon some time ago is fine. The issues that we're talking about are what do you do when there's an urgent request that meets that definition? That's one point.

Ashley put in the comment about the potential for abuse by requesters and whether there's accountability and so forth. I think all of that is absolutely essential. And I also am very empathetic with the two issues that registrars have said repeatedly. One is the imposition of excessive

---

extra costs in the form of having attorneys on the call at any moment, and the other is the risks of responding, disclosing information, and then being held accountable afterwards. Those are both very, very sensible, and there's plenty of room to have a sensible way of dealing with those and at the same time to provide the level of response that is in fact required for things that meet the definition of urgent requests for lawful disclosure. The minimum requirement is that you have a way of contacting the organization and contacting the registrar and saying your house is on fire or we have a fire and you have to help.

What happens after that is a separate and distinct action. The mere fact that the phone gets answered does not necessarily mean that the data will be provided. I'll come to that in just a minute. So a minimum requirement is that there be an effective way of reaching the registrar on an urgent basis. That is not yet included in any of this. Yes, you have published phone numbers and you have for DNS abuse and so forth, but it's not a mandatory requirement and it's not observed uniformly across all of the registrars, and it is not an expensive thing to impose on the registrars. You don't have to make it public. It can be a private communication that's filtered by ICANN or some other intermediary that has access to those, but that's very straightforward from an operational point of view that the people who need to contact each other find a way to do that. That's common across every industry and certainly common across our industry in the operational community and this falls into that area.

Now, what happens when the phone gets answered? Well, first of all, we want to make sure that the person who's calling is identified and better yet, that there's some knowledge about who that person is, what

---

---

their history is. If it's an FBI agent who is known to everybody, that's quite different than if it's a random person off the street who says, "I think there's something serious going on and you have to take action right now," and just goes on a rant. That is very easy to separate and what happens after that is up to the judgment of the registrar. I'm not suggesting that we write in concrete anything specific that happens after that. In general, there'll be three possibilities. One is, "Oh, we understand this is a serious problem. Yes, we'll take care of it. There's no problem about getting attorneys involved." This falls clearly into an area that we're comfortable and we'll be responsive right away. The other end of the spectrum is, "We haven't got any idea who you are. You're not making any sense," and you hang up the phone. The third possibility is, "No, I don't know. This is going to take some sorting out." At that point, you revert back to calling in some help from attorneys or whomever and you take whatever time it takes to sort that out.

That makes it, from an operational point of view, very likely that real urgent requests that meet this definition coming from trusted sources and with accountability of who's calling get treated properly and you've got a workable solution. It also provides plenty of latitude for registrars to either refuse or to take whatever careful steps they need to take in order to protect themselves from consequences of improper disclosure another time.

All of those things are easy to implement. All of those things are relatively inexpensive. They provide plenty of flexibility for dealing with large and small registrars. At the smallest end of the people, the ones that you're concerned about, they don't have the budget for keeping attorneys on call, all that they have to have is a contact phone number

---

---

and the agreement that they answer the phone when it gets called. At the tiny end, one-man registrar, if you want, that's his cell phone and it wakes him up at night. At the other end of the spectrum, it's relatively trivial to include it into all of your operational procedures. Thank you.

DENNIS CHANG: Chris, welcome.

CHRIS LEWIS-EVANS: Hi, everyone. I just want to cover one thing that's been said a couple of times in the chat. That's around asking contracted parties to break the law. That's not something we're asking them to do at all. The scope of GDPR covers processing of data for threats to public security, which is realistically where the definition of urgent request would do. That marks the processing of personal data out of scope for GDPR. A law enforcement agency, a competent authority asking for that data wouldn't be under the scope of GDPR anyway. So what we're asking here is not for contracted parties to break the law. It's well within. There will be cases that that needs to be considered. You need to make sure that they are a law enforcement agency. I think some of that negotiation and conversation will obviously need to be made to make sure they're happy disclosing that information under those purposes. But we are not in any way asking laws to be broken by this mechanism. You know, there are lawful purposes in many places for competent authorities to process data lawfully for these sorts of reasons. And this is generally well covered in laws internationally. Thanks.



---

DENNIS CHANG: Thank you, Chris. Sarah, go ahead.

SARAH WYLD: Thank you. This is Sarah. I believe that we heard a suggestion to return to the language that Roger proposed. I would be happy to look at that. Or I think I've heard several people suggesting that we could resolve this by returning to the language that we put out for public comment. I would be thrilled if we could decide on that. Thank you.

DENNIS CHANG: Beth?

BETH BACON: Yeah, so I agree with Sarah. I think that's a very constructive way forward. Lauren also suggested that that was something we could consider working off of. So is there a way we could put that proposal up on the screen and discuss it?

DENNIS CHANG: Roger's suggestion was this, I believe, this one here, option four. But let me know if I didn't get it correctly. Yeah, on top here. So this says without undue delay, generally 24 hours, not to exceed two business days. So the issue with this language is essentially the same as two business day of option one. The only difference between option one and four is addition of generally 24 hours. And it does not resolve the ambiguity or absence of definitive timeline described by calendar days, I mean, described by business day. And therefore, that was the reason

---

why the EPDP Phase 2 team has chosen to use calendar days instead of business days. Now who has a hands up? Sarah, go ahead.

SARAH WYLD:

Thank you. With regards to the possible ambiguity of business days, I believe that the Phase 1 EPDP team who made this recommendation specifically chose business days because they are business days and not calendar days. I think that was on purpose, not by mistake. I think we need to maintain a multiple business day period. Thank you.

DENNIS CHANG:

Gabriel, can you open up your mic and talk? Welcome. By the way, I believe that our last call, you had some ideas about potential language that you wanted to propose.

GABRIEL ANDREWS:

I have not taken the opportunity to put it into text. My apologies for that. I had hoped to do so and just fell behind. But the language that I had put forward in our last conversation dealt with well-founded requests. Just to refresh everyone's recollection, my thought was that there are going to be situations in which the disclosure determination is very easy and there are going to be times that it isn't easy. I think Steve Crocker was speaking somewhat akin to this just a moment ago. I believe that if you were to bifurcate your decisions thusly, you might have the ability to respond the majority of the time in a very quick manner for all of those instances in which it is easy. And however you want to define that can be a matter of discussion. But the exceptions to

---

that rule can then be the extenuating circumstances with an extended timeline accordingly. That was what we spoke to.

I think that there's also more updated text. Apologies for joining the call late. But I don't know to what extent Laureen, my counterpart from the Public Safety Working Group, has had time to put forward some additional text. But we have had discussions with the greater working group as well trying to find collaborative and perhaps more acceptable and palatable text for the group here. Perhaps Laureen, can you advise whether or not that has occurred?

LAUREEN KAPIN:

It hasn't occurred, but I'm about to put something in the chat that has some of Roger's language in brackets where I see the key difference and language that we were also considering as a proposal. So I'm putting that in the chat now.

DENNIS CHANG:

Laureen, if I can summarize the requirement that's to be implemented, is it not 24 hours?

LAUREEN KAPIN:

I think that's where I see the difference between Roger's proposal and what we've been talking about. Our proposal has been 24 hours. I think Roger's proposal, and that's why I put the language in brackets to underscore this. Roger's also refers to 24 hours, but does it in a way that's softer. Roger has a generally not to exceed 24 hours.

---

DENNIS CHANG: No, no, no, no. Roger has not to exceed two business days.

LAUREEN KAPIN: No, no, no, no, no. But I'm talking about the generally 24 hour.

DENNIS CHANG: Yes, generally.

LAUREEN KAPIN: He has a generally, and actually I guess I added not to exceed, but I shouldn't have because the not to exceed is referring to the business days, not the 24 hours. I'm not sure that it's a substantive difference, but there's a qualifier there that I think gives what I would refer to as breathing room.

DENNIS CHANG: Okay, let's move on. Sarah has her hands up. Go ahead, Sarah.

SARAH WYLD: Thank you. This is Sarah. Maybe I misheard. It sounded like Lauren just referred to there being a business days period in the proposal that she pasted, which I don't think I see in there.

LAUREEN KAPIN: There isn't. There isn't. I didn't say that.

SARAH WYLD: Thank you. No, I definitely misunderstood then. Thank you. Just going back to Gabe's point about requests being simple to review, some of them are, and lawyers often work long hours. So some requests will be answered right away or within a few hours. That's why the baseline is without undue delay, which is what it should be. But sometimes there needs to be longer. Sometimes the lawyer is away and has to come online, right? It just can take longer. And so there needs to be that flexibility of up to two business days, which also is in alignment with the recommendation that we are implementing. Thank you.

DENNIS CHANG: Thank you, Gabriel.

GABRIEL ANDREWS: I'm sorry. Just, I want to clarify what Sarah is saying.

DENNIS CHANG: Okay, Gabriel. Beth has her hands up. Sorry.

BETH BACON: It's okay. Go ahead, Gabe.

---

GABRIEL ANDREWS: Okay, I'll make it fast. Thank you, Beth. Just to clarify, I want to make sure I'm understanding. Sarah, are you suggesting that there are no situations in which a request can be reviewed absent an attorney?

SARAH WYLD: Thanks, Gabe. I'm not sure that I can answer that exhaustively. I know that at my registrar, these requests are all reviewed by an attorney because the balancing test is a legal decision. It's possible that other people are authorized or trained to do this at other places. So I was just giving an example of often why these requests do need a little bit more time is because they might need to go to a lawyer. Thank you.

DENNIS CHANG: Yeah. Beth, you're up.

BETH BACON: Yeah, thanks, guys. So I think I don't have a vehement reaction to, against Lauren's language. It is confusing though. If we know, I find, I do think that she and Roger are trying to get to the same thing, but in Lauren's language it says, but no later than generally not to proceed. How can you be not later than as a definitive, but generally not more than? It feels like it's just not later than 24 hours. So I think that the generally, the way that it is incorporated in Lauren's does not give any flexibility. In Roger's, it's Roger, right? Roger's language. Sure. It is generally 24 hours, meaning it is 24 hours. If it goes over on a general basis, like every now and then that's okay. But I think that actually the Roger's is more enforceable by contractual compliance because, correct

---

me if I'm wrong, reasonable and generally have like fairly definable characteristics in that generally most of the time it will not exceed 24 hours. However, on occasion it may. So that is something that compliance could measure. So I think that it is actually more clear and is an actual floor. And I like that also we have a ceiling of not to exceed. So I think that this language needs both that floor and the ceiling. And I think that the generally 24 hours means it's generally 24 hours. It's not supposed to be more than that. And if you do go over more than that, then you're going to get an email from compliance that says, please try, but please do better. So I just think it's a little more implementable. Thanks.

DENNIS CHANG: Hey, Thomas, go ahead.

THOMAS RICKERT: Yeah, thanks very much, Dennis. Now, can we maybe get the best of both worlds by having three components? And maybe we can even make this less wordy than what we heard and read so far. So we keep the undue to make sure that everyone has to start working on things immediately. We say that within 24 hours, or you can't exhaust 24 hours without giving any further explanation. But if you need more than 24 hours, you need to provide a rationale as to why you can't respond within 24 hours. A definitive answer needs to be given within two business days. So we would augment the proposal from the public comment period by sort of shifting the burden of proof if you wish, so that the contracted party needs to explain itself if they need more than

---

24 hours. And I think that that can probably help bridge the gap, because then the contracted party that is just irresponsible will be punished, if you wish, by ICANN compliance if they can't even show to ICANN compliance that they tried to call a lawyer on the weekend. But if they did what they could, but if they just can't progress faster, then they can get a little more time to get the job done.

DENNIS CHANG:

So let me see if I can capture that. Without undue delay, that's the first component. And the second component is 24 hours, generally. And then third component is not to exceed, what, two business days or calendar days?

THOMAS RICKERT:

My suggestion was undue delay. 24 hours you can take without providing any reason. But if you want to take up to two business days, you need to provide a rationale as to why you could not respond or why you need to need more time than 24 hours. But under no circumstances must your response take longer than two business days.

DENNIS CHANG:

Okay, I think I got it. So what you're saying is without undue delay, 24 hours generally and up to two business days with explanation. So the final limit is really two business days, same as this.



---

THOMAS RICKERT: So it's not the same. It puts a burden on the contracted party to explain themselves if they need more than 24 hours. And that, I think, picks up the point that Gabe made. For easy scenarios, you might not have a good reason to take more time than 24 hours. So you need to be prepared to explain as to why you needed to exhaust more than 24 hours.

DENNIS CHANG: Okay. I think I got that. Okay, thank you. Next is Laureen.

LAUREEN KAPIN: Thanks. Thanks, Dennis. And I definitely appreciate something a little more thoughtful than the, "This is a non-starter" response, which I don't think is constructive or helpful. So I'm very appreciative to Thomas for helping us move on this. And I had proposed this language and it wasn't fully formed. So I definitely take Sarah's point about the, and it may not have been Sarah's, but I think it was, about the inconsistency between the generally and then a hard stop. So I find that this is something that's definitely worth considering.

I have two comments, one with regard to the without undue delay and the second with regard to the business versus calendar days. Without undue delay, one thing that makes me uncomfortable with that is it's a negative construction of the concept. And that's why the language that I proposed contained the word swiftly, although I'm not wed to swift, but something that captures that. And my proposal would be to have swiftly and without undue delay, because I think that that captures the concept

---

better of what the expectation is. And also it seems to be in sync in any event with what most of the people around the table are already doing.

With the business versus calendar days, we are more comfortable with the calendar days because of the clarity that calendar days conveys and the clarity that avoids the many different interpretations or just differences. And this is something Rubens has pointed out, that different places in the world celebrate different holidays, have different time periods where people may be out of the office. Calendar days is a term that is not susceptible to a whole bunch of different views and therefore it's our strong preference. So I did want to comment on those two points. Thanks.

DENNIS CHANG:

Okay. Chris.

CHRIS LEWIS-EVANS:

Yeah, thanks. So I think Laureen's pretty much said everything. I think Thomas has sort of picked apart the proposal from Laureen and what we're looking for that's key is just some response back in a timely manner that says, actually we can't comply with this. We need to get a lawyer. We haven't got one. Or this data is actually somewhere else. We need to access it via a different mechanism or something along those lines that allows us to see that there is some response and some response coming before we start going down other mechanisms or having to put other tactics in place. So I think it's a good compromise.

---

I know that business days, calendar days causes lots of issue and I wonder if three calendar days or if there is a number of calendar days that makes that a little bit clearer or a little bit more practical for registrars. So I'd be interested to hear about that rather than going to business days. But yeah, be interested to hear what the view is on that. Thank you.

DENNIS CHANG:

Sarah.

SARAH WYLD:

Thank you. I am actually really surprised at what we've just heard, which is a suggestion that registrars will not respond in a timely manner. Chris is looking for a response back in a timely manner. Registrars will provide that. We have all agreed it will happen without undue delay. Sometimes there needs to be time to consider it. Maybe to get legal advice. Maybe it's Christmas Day, which many but not all people observe and you're just not in the office that day. We know that when a life is on the line, law enforcement has several methods to contact the registrar. We know that they will use those several methods. We've heard that.

So what we're establishing here is not, it should be a baseline without undue delay. But what we need is a cap on it, a maximum that is doable for those edge cases on the edge case that we're debating here. And what you need to hear is that sometimes there needs to be two business days. And we have to implement the recommendation faithfully, which is not a period of calendar days and is not an

---

automated immediate system that was not able to reach consensus in the working group. Thank you.

DENNIS CHANG:

Gabriel?

GABRIEL ANDREWS:

Hi, I think that we might benefit from sort of teasing out using different words on response because I'm hearing response used in ways that I think could be construed differently depending on whether it's the initial response or this disclosure determination. And what I'm getting at here is that when we're talking about when the notice is given back to the requester that, "Hey, this is an unusual circumstance and it's going to take us longer to make a disclosure determination." I think that as long as that happens swiftly and within the 24 hours is what we're suggesting that that is something that has to come swiftly and not wait. And that when we're talking about the disclosure determination, that will come after the more extended analysis that then is going to be justified. And when we're looking at Thomas's suggestion there, I think that it's a very interesting way to phrase it. But then when you're saying that that explanation is forthcoming, hopefully the notice that an explanation is forthcoming was provided initially within that 24 window to just to clue in the requester, like, hey, this is happening. So they're not left wondering for a period as long as however many business days.

---

DENNIS CHANG: What would you feel comfortable in number of calendar days that equates to two business day? What would be your assumption? For example, if it takes 10 calendar days, is that okay? The two business days could be interpreted or in factually that is sometimes in around the globe is the case. So I think Rubens pointed this out. We need to be culturally sensitive.

GABRIEL ANDREWS: I see Laureen has commented in chat three calendar days. I defer to her there.

DENNIS CHANG: Okay. Thank you. Next is Steve Crocker has hands up.

STEVE CROCKER: Thank you. Sarah said with certainty and earnestness that law enforcement has access to all of the registrars. No problem. I've heard exactly the opposite, which is one of the things that has really gotten my attention, that there is no organized concrete way for law enforcement to reach each of the registrars. There may be individual cases where that's true, but there's not a uniform and tested and robust method for that. That is a serious problem.

DENNIS CHANG: Sarah, go ahead.

---

SARAH WYLD:

Thank you. This is Sarah. I'm going to come back to what Gabe asked about how response is defined. It is defined as considering, I don't remember the exact language, but it's you have to consider the request and make a determination and carry it out. So it's not just to look at it and say, oh, I can't decide yet. I need more time. There is this time period that we're debating now, but this is it, right? There's no wiggle room to say that response actually is just, yes, I've received the request. That doesn't help anybody. We don't want to say that, right?

I really liked Thomas's proposal. I will need to think about that a bit more, but I think it's worth thinking about. Thank you.

DENNIS CHANG:

Gabriel?

GABRIEL ANDREWS:

All right. Thank you for that. I think that clarification helps me in particular because I haven't benefited from the benefit of being in this group as long as you folks have. So if there's a specific term for response for that, then I think we could use a different word entirely, but just a perhaps notification to the requester that the request has been received and that there is going to be a longer review period needed due to extenuating circumstances, however Thomas first proposed it. Because I think that there's this general consensus here that [inaudible] proposal is interesting. And I think that we could perhaps coalesce around this for some more productive conversation. I just really wanted to tease apart the notification back to the requester versus the actual disclosure determination because there could be two distinct pieces of

---

communication. And what I as a cop have really the biggest concern about is just not having radio silence for an extended period having made the request. I think that getting either a response back in your word, the real response back quickly or at very minimum the notification like, hey, this is the outlier. We're going to need more time. So here's a notification, if that work works. And hopefully that all makes sense.

DENNIS CHANG:                   Laureen?

LAUREEN KAPIN:                Yeah, just building on what Gabe said, I think what we're talking about here is an acknowledgment/rationale for more time to go back to Thomas's construct, which is different from the actual response.

DENNIS CHANG:                Yes. What I see is the key difference is business days versus calendar days. I've heard the assumption that some people are making that two business days equates to three calendar days. And I have been coached that that is a very US/UK-centric view of looking at it. Of course it is, right? I for one, I think early on made the point that in my dealings with business in China that in Chinese New Year, they could shut down for three weeks. And so two business days in my mind could stretch out to three weeks. Now, if that's okay, and that is the understanding and the recommendations and the enforcement that you would expect, then business day is fine. So whether it be one business day or two business

---

day, it really doesn't make a difference in that sense. To be precise, the time must be defined in hours or calendar days. That is universal, uniform and that cannot be disputed in terms of enforcement. So I'm trying to make sure that ICANN Org understand in the same way that everybody does and the whole implementation team, including IRT can stand behind what this means, because that is a question we are sure to get. What does two business days mean? And who defines it? Is one of those questions that we will receive when we try to implement that. And I want to hear more about this. Thank you. Anybody? And because of that complexity, that difference in view, I've heard the EPDP phase two team settled on three calendar days as a compromise. And that's what we have landed on. The ICANN Org position is that three calendar days is the limit, clearly defined limit. And one business day, while it can be flexible based on where you are, the upper limit is three calendar days. That's defined for everyone. Beth, go ahead.

BETH BACON:

Thanks, Dennis. So I'm looking at Gabe's comment of two business days or three calendar days, whichever is shorter. I think the point is, we don't always know which is shorter. One could be way longer depending upon the jurisdiction. So I will recall as a member of the PDP and as a member of this IRT from the absolute first call, we have been discussing this and gone back and forth. And perhaps that does not stay perfectly true to the recommendation. Perhaps our outcome will not be perfectly true to the recommendation, which is not great. But the reason we said business days was because you can define a business day by it's not a vacation in that jurisdiction or it's not closed. I think it was more consistent than a calendar day. And it guaranteed more action because,



---

again, a calendar day, it could be three days over Chinese New Year when no one's working. And I so I and I think that that there is there is absolutely need for all of us to coordinate better and create more solid contact points. I think we have done a fantastic job as a community working with law enforcement and law enforcement with us to do to improve these relationships. I'm just noting the level of activity of law enforcement folks on this IRT, which is something I have never seen before. And I'm very open to it. I'm glad you're here. But I also think that we are not with this policy scoped to fix that whole problem. We are trying to get you a response in a very clear way with a clear timeline to urgent request for personal data. And I think we need to focus on that and not necessarily trying to fix the whole problem right here, because I don't think that's what this policy is for. And I don't think that's what we're going to be able to achieve. I really think that Thomas's proposal has a lot of merit. I think it has some ways forward. And again, I'm just going to throw out there that we did have consensus on the language that went out for public comment. It still exists. So I think that let's try and not boil the ocean here. I hate using that term, but sometimes it works. I think let's try and focus on the clearest timeline that we can get that is workable and isn't just going to continue to be missed by contracted parties simply because a lot of us, even at larger registries, have one person that is able to review these who has the qualifications because they are based in various jurisdictional privacy law, not just GDPR. So maybe that person's out. Maybe they're not on vacation. Maybe they're sick. So I think that we just need to focus on getting a very clear timeline so that everyone has predictability. I think that is the name of the game here. Thanks.

DENNIS CHANG:

Agree with you wholeheartedly. Clear timeline is what we're trying to define. And I agree with Sarah and Rubens's comment that we're not implementing phase two policy here at all. We have no rights to do that. And it's not within our remit to implement phase two policy. The board has absolutely, has not passed that resolution and we're not directed to do that.

As I explained at the beginning of the call, the reason that we are using one business day not to exceed three calendar days is because when we looked around, 24 hours met with a lot of objections from the community. Two business days also met with a lot of objections from the community. So we were looking for some compromise position and we found this requirement and that was the only requirement that we could actually find that one business and not to exceed three calendar days. Seem like to me at least a compromised position that I'm sure that the people who are arguing for 24 hours and the two business days, they both would not like, but maybe is something they can live with. And maybe perhaps that was the reason why the working group have settled on those languages. So I hope that's clear that we're not, and we should never be implementing policy without before approval and direction. Marc Anderson. Hey, you've been quiet. You're here.

MARC ANDERSON:

Hey Dennis, Yeah, I have been quiet. I've been listening and I have lots of thoughts and lots of comments. I just, I don't know that any of them will be useful or productive. But I do want to speak up on the phase two

---

SLAs. I brought this up on the last call. I mentioned that that's not exactly what the phase two policy recommendations say. It's not an absolute, it's a percentage of your responses and you in an email follow-up said you, or the IPT would consider that point.

And I also want to point out it's really not an apples to apples comparison either. With urgent requests via the proposed SSAD system, contracted parties would be getting those urgent requests from already verified and approved requesters. Whereas the policy that we're talking about now are for fielding requests from literally anyone. You know, as other people on this call have already pointed out, if you already know who your requester is, your process for dealing with them is a lot easier and a lot different than if you do not. And so it's not necessarily an apples to apples comparison. The other responses coming through the SSAD, you already know who your requester is. And that's not something that can be guaranteed with the policy that we're dealing with now. And I think that's part of the challenge, I think.

And I'll say a little bit more. I don't know if this is going to be useful, but I want to say on this call, I'm hearing a lot of people listening to other viewpoints and other people on the call, which I very much appreciate. I think there's a real sense of people coming together and trying to come up with a compromise that will work and not just digging into entrenched positions. So I want to compliment everybody on this call for that. I think that's admirable that we're still listening to each other and still trying to come to a compromise position that'll work for everybody.

---

I also think I want to point out where we do agree, like, everybody agrees that for truly urgent requests, everybody should be responding as quickly as possible. The goal here is for truly urgent requests to be addressed as quickly as possible with whether you want to do without undue delay or swiftly or as soon as you can whatever your language, we all agree on that. And so I think we have to acknowledge where we do agree, if we're ever going to address where we don't agree.

And where we don't agree, I think is really on issues of compliance. You know, there's concern about bad actors not responding without undue delay and how we enforce that or how we address that. And there's concerns with bad or abusive requests that registrars are just not able to deal with or address in a timely manner. And they're concerned that registrars that are making legitimate attempts to comply with their contracts and respond as urgently as possible are just overcome by events. They don't want good actors making legitimate efforts to respond without undue delay, getting unfairly dinged by compliance. And so we're trying to find a language in the middle that acknowledges all that. And I appreciate that. I appreciate Thomas's and others' suggestions to try and find that middle ground. But I do want to point out that we all seem to be united in an effort to respond to legitimately urgent requests as quickly, swiftly as possible without undue delay. And hopefully we can find a language that everybody will live with.

DENNIS CHANG:

Sarah?

---

SARAH WYLD:

Thank you. This is Sarah. Yes. As Marc points out, requesters being verified helps to streamline the process and reduce the volume of incorrectly marked urgent requests, which we currently do receive. And that allows the true urgent requests to not be lost in this stream of everything else. So that is part of why it's not, I think, a good choice to implement that phase two language here, which also, again, does not properly implement this phase one recommendation. Thank you.

DENNIS CHANG:

So my view is this proposed language, we would not have proposed it if we thought that it did not align with the recommendation language. I believe it does. This one does, too. This one does, too. This one does, too. And I think all these options do. Thus, they do implement the recommendation in line.

Now, when the PDP working group has not made a decision and turned it over to implementation team, it is us that has to choose one of these options or come up with another one. Gabriel has a hands up, but I want to talk more about what it is that, which option is the one that this IRT as a whole would most likely to support. And I understand that there's issues with every one of these, but I'll give the floor to Gabriel and then Beth.

GABRIEL ANDREWS:

I had a question for the group because I wasn't present for the discussion that I hear has happened a lot about the term of business versus calendar. But for those that partook in other previous discussions about business days, was there a commonly understood maximum

---

outer edge to what business days could be? I've heard from Dennis that China perhaps has three weeks. I experienced when I did collaborative work with my friends in Canada that often people went to cabin season in the summer and might disappear for a month at a time, although not their whole agencies, but perhaps individual people might.

And so I'm just wondering just purely as a thought exercise, if you had a red team exercise testing the outer limits, could you make a case for a work year of two days out of the calendar year, right? Like what happens when you have a registrar that says, well, we're in operation on June 1st and June 2nd, that's it. And I just wonder what is the outer limit that I need to be concerned with that is reasonable that could conceivably happen and whether or not anyone has an answer to that, I'd be curious to hear.

DENNIS CHANG: Beth?

BETH BACON: Yeah, hi. So I don't think we're talking about vacation. We're talking, I think that reference was to official holidays in that in said jurisdiction. And I don't know that I can offer a definitive list of those things out of my brain right now, but I'm sure it exists. But I think that that's why, again, that discussion around two business days versus calendar days was something that we spent a lot of time on in the PDP and this IRT. But seeing that we have eight minutes left and I don't think any of us want to have another call on this, I think my question is, and I put it in the chat, is anyone a hard no on going back to the public comment

---

language? Or can we boil this down to let's look at Thomas's language more? Because I think there was some support on all sides that that had some potential. So do we want to do a raise of hands? It's not a vote, it's just a sense. But like, where are folks? Because I think otherwise we're just going to keep talking about these nine suggestions that are being displayed. But I think that we have had some support for Thomas's, but I think also that first public comment, like, guys, we did good work on that. We worked hard and we came to that compromise. It wasn't perfect, but none of these are going to be perfect either. So I know that I'm beating that dead horse and I'll stop. But I do think that we worked hard on that.

DENNIS CHANG:                   Laureen, go ahead.

LAUREEN KAPIN:                I just want to make sure I understand. I appreciate your quest for clarity, Beth. It's very practical and helpful. I just want to make sure I know what you mean by the public comment version. You don't mean Org's reflection on the public comment. You mean what was put out by the IRT originally.

DENNIS CHANG:                   Yes.

---

LAUREEN KAPIN: Okay. Yeah. I mean, you saw Chris respond. The GAC wouldn't have made a public comment and detailed all the reasons why we weren't comfortable with that if we could live with it. So we do have a hard no for that.

DENNIS CHANG: Yes. Thank you. That was clearly noted, not just from the GAC, but other public commenters. And that's why we went to 24 hours only to be met with a hard no from the IRT members. So Chris, go ahead.

CHRIS LEWIS-EVANS: Version one on the option front is a hard no from us, as Laureen just said. And I objected during the IRT discussions that we had to it as well. 2.5, I think is a great halfway house between the public comment and the post public comment version. I think that's the closest thing we've got to agreement. So I wonder if there's any one here that can't live with that and whether there's any tweaking that can be done on that. That's where I am. Thanks.

DENNIS CHANG: Yeah. I want to hear more from others on 2.5. Are we hearing hard no on 2.5 as well? Seemed like there has been the most support there. And remind you that the hard no was because of the two business days. And this one still has two business days. But as you pointed out, but this one is different because it has the explanation component of it. So that is different. And that explanation could be a vehicle for the businesses to explain what their business days are. And if it was Chinese, they might



---

come back and say, "We're on Chinese holidays. So we'll get back to you in three weeks." And now you have that answer. So then the requester has to make some decisions on what to do next, I suppose. But I just want us to not go away from this meeting having different understanding. I want us to at least me clearly understand what this means so I can explain it to other people, which we will have to work on as an educational material and FAQ and whatnot. Beth, go ahead.

BETH BACON:

I'm seeing a lot of open to 2.5 in the chat. And I wanted to say kind of verbally that I'm open to 2.5. I would love if we could take these like three minutes and whoever is in this Google Doc, Thomas. And just like pop in the actual words into the blue part so that we can look at it and be like, "Yeah, that looks good." So that we can look at it. So we can look at the whole thing. We have six minutes or four minutes. I will stay for another 10 minutes. I will stay for another 30 minutes if we think that we could get to yes on this particular proposal.

DENNIS CHANG:

Go for it either in the workbook itself, you can just write it in here or you can chat it and we'll copy it over. This is our workbook, right? It's open to all the IRT members to edit.

LAUREEN KAPIN:

Dennis, it's Lauren. I would love to see this language and I would love to see us get over the finish line. But not in three minutes. If we could circulate some proposed language and just give a little time for folks to

---

see it in black and white and confer among themselves, I just think that that's a better process for us.

DENNIS CHANG:

Of course it is. I just want to maximize our time together. Every minute counts. So if you so dare to write something right now, and of course you can change it later, but anyone. I think conceptually I understand what Thomas has proposed. So one more time, if it's not in writing, Thomas, I ask you to repeat your concept one more time. So let's hear from you directly.

THOMAS RICKERT:

Sure. So the idea is that urgent requests for lawful disclosure need to be responded to within 24 hours, either by offering a substantive response or by providing a rationale as to why the response requires more than these 24 hours. In any case, the response may not take longer than two business days.

DENNIS CHANG:

Okay. That's slightly different than the way I heard it, I understood it, but let me see if I can. 24 hours or-

THOMAS RICKERT:

I tried to make it shorter in terms of words. I tried to bring in Gabriel's point that the requestor shall not be without any response for longer than a maximum of 24 hours.

DENNIS CHANG: So without undue delay, component one, 24 hours generally, component two, if you can't make 24 hours, provide a rationale why, explanation, but in no cases—not to exceed two business days. Yeah, I think I got that. Those are good components. Okay. So around that, we can build a language. And I am sure there are people who are good at this. Okay, you are providing a language. Let me see if I can copy it over.

BETH BACON: That's just from some quick group drafting in the background. So if Thomas thinks that says what he was saying, then ...

THOMAS RICKERT: No, it doesn't that much matter as to what I think. You have to like it.

BETH BACON: I mean, I liked what you were saying. I want to make sure [inaudible].

DENNIS CHANG: It's important that everyone likes it, including you. I know that you're trying to help, and this is great that you are here doing this. And I know that I have personally pleaded with you to help us. And of course, Thomas and I worked together for many years and he's really good at this. We're one minute over the time.

---

GABRIEL ANDREWS: Can I confirm that somebody is capturing those attempts at transcription in the chat? Because I think several people tried to put to words what they heard Thomas saying. And I just want to make sure that the chat's not lost before the room closes. It's recorded. Thank you. That's all. Just a moment of paranoia. Forgive me.

DENNIS CHANG: Yeah, we are capturing every word. Every chat is recorded. So, we will continue to look at this. And we will, as you say, what is it? Distribute the potential language. And hopefully, we don't have to meet again. And hopefully, we can put our hands down. As I said, this is the month, right? We have to turn it over to our processing team. And this is the final, final, final, final item that was outstanding. Go ahead, Thomas. Go ahead.

THOMAS RICKERT: Yeah, just a quick one. I think that the language offered by Beth and the language offered by Sarah pretty much captures what I suggested. Different words used, but I think that encapsulates it pretty nicely. So, it's Beth's. She introduces it with, "Thomas, how is this?" And then a little later, Sarah put something into the chat. Chris, with the language that you suggested, you're introducing the idea of requesting an extension to make the disclosure determination. I'd rather keep that to just the registrar or the registry for that matter, offering the rationale, but not engaging in a requesting process that might require a request to be granted by the requester or something. So, that might make things more complicated, in my view.

DENNIS CHANG: I agree with Thomas. Okay, thank you.

THOMAS RICKERT: But I think, Chris, the idea is the same. So, I think we seem to be converging to consensus on the general mechanism. And I trust that staff will, Dennis and team, will find the right words based on what we read in the chat.

DENNIS CHANG: Yeah, I'll wordsmith with the team here and make sure that it's kind of, it fits within the section 10.6 that we have been looking at, and we'll distribute that. And then that version will be our final version, really. And I think we have resolved every issue, and this was the last one, as I said.

I just have to say thank you. What can I say? Thank you, thank you, thank you. Great work. You guys all jumped in at the last minute.

THOMAS RICKERT: Thanks to you, Dennis, if I may say so.

DENNIS CHANG: Thank you, Thomas. So, I'll say goodbye. Bye-bye now, everyone.

ANDREA GLANDON: Thank you, everyone. Have a wonderful rest of your day.

---

[END OF TRANSCRIPTION]