
DENNIS CHANG: Go ahead, Dana. Dana?

DANA KUEBLER: Yeah, unmuting would be fantastic. Thank you, everyone. Hello and welcome to the PPSAI IRT third session this 8th of August 2024. My name is Dana Kuebler, and I'm the remote participation manager for this session. Please note that this session is being recorded and is governed by the ICANN Expected Standards of Behavior.

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DENNIS CHANG: Thank you, Dana. Let me just cover some of the administrative logistics item. So what you're looking at is the IRT Wiki page. I know that some of you are new and this is your first IRT session, so I welcome you. I would like you to go ahead and introduce yourself to the team on the chat, just your name and affiliation. And just as a reminder, this is how we are tracking the IRT members. As recent as yesterday, we had people joining, and we are up to 55 members as of today. You will see the

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name, affiliation, SOIs linked to them so that you can learn more about each member.

For today, our agenda is to give you a little recap on the overview of the process, and then we are going to dive into your clarifying questions on the doc. So the clarifying questions that I'm referring to are on this commentable version of the Final Report. But let's start with this overview.

This is a slide deck that is from our first meeting on the June 2024 kick-off meeting that we had in Kigali, ICANN80. We went through this slide deck, and we presented it as an orientation for the IRT. And in it we talked about our work plan, and in high level, this is what we were planning. So first, of course, you know the orientation, introduction, and we set up all the workspaces and the tools, and we are getting to know one another and know how to use our tools and refining the tools as we go. One thing I know and I teach what I call art of program management, and what it is is every project and every team are different and unique. Therefore, as much as we can, we are trying to get the IRT or the team members to use the tools in the best way we know how, but at times it's actually okay to adopt the tool and the processes to meet the IRT and the team that you have. So that's what I am doing, and you see me adjust the work process and adopt as we go, and I'll talk more about that.

So, first, it was introduction and education, and then we want to have a series of meeting, what I call a scoping meeting, and that's when we are talking about all the clarifying questions or the concerns and everything that we need to do to get to a point where we could make a decision

and that is knowing which direction to take. One possible path is that policy work is needed and that we have to go back to GNSO. Another possible path is we find that within the IRT, we can resolve all our questions and know what we need to do and is in line with the recommendation and the Final Report, and we have what we find, an implementation path. That's another outcome. It could be a mix, right? So when we get to that point here, we may find sort of a hybrid or mixed path, but that is going to be a careful consideration and decision for us. But for now, we are here. And what I mean here is six to eight meetings is what I thought we were going to do. But based on the feedback, and I thank you for those who gave me feedback, input via the e-mail, that was great. I was able to observe and take your input and actually adjusted our plan. Let me tell you what I mean.

This is our work plan. It's in the IRT workbook. You have access to it and you can read up on it anytime you need. Now, for those of you who do not have the access yet, please gain access. You know that Dana, Nur, and Leon are here to help you do that. So this is where we are today, August 8, today's meeting. And what we are saying is we're going to discuss Q&A. I originally had it set up we're going to do all 21 recommendations in one session. But based on your feedback and the way you see the benefit of seeing each question as a team and hearing other people, other IRT members, on those recommendation questions, I agree and I have adjusted. So what I've done is breaking out the clarifying question review from one through seven as today's objective, and we'll have another session to see if we can cover the next set and the following.

Now, if we happen to go faster and we're comfortable with that and we all agree, then, of course, this schedule is going to be shortened. But the way we are building this up is going to be stretched out longer than what I had intended initially because we're taking it slower. And also, there's one change when after our clarifying question, I was going to dive into the concerns, but I think what we should do is review the analysis that ICANN Org has done already on the recommendations. This was provided to you or as a homework item. And let me remind you, it's this one. Yeah, this is the homework. So this item is where you can see all the analysis that was performed by the ICANN Org, and so that you can maybe have a benefit of what we are seeing and how we're reading it. But what I think we will do is we're actually going to not just have you review it on the site, but we're actually going to ask you to look at our analysis and comment on it like you are doing with the Final Report. And while you're going through that, perhaps that will answer a lot of the questions and concerns that you've had or will have. I think that will make it lot more efficient.

So this is the plan for now. If you are looking at this in a high level—let me see. So first we do clarifying questions, we look at the analysis, and we'll address every concern that you have to try to answer these threshold questions where we are taking hundreds of questions and concerns and see which ones we can work out within the IRT on our own. And if there are threshold questions that remain that need to go to the GNSO, I want us to really agree that it does need to do that, and then we will send it, communicate that to the GNSO as following our overall plan, and that is this decision point. So that's what we're driving to. There's vast amount of information we have, lots of experiences and

“opinions” that IRT members have. And what we are trying to do is take all of that and put it against the recommendations that we have received. This is the official language that we have to work with. Let’s work this out so that we can know what exactly are the threshold questions that we need to deal with and whether or not we can make the decision on our own or we actually have to defer to GNSO. That’s where we’re going.

Now I’ll pause here and take questions on the process before I go head into the Final Report comments. If not, we can dive right into it. I’m going to go from top to bottom. So I’m going to try to not skip anything. Even if I show it briefly, I will show it. Now, the design of this process is that we are going to focus on clarifying questions, and I try to explain this in the e-mail and previous sessions that if we do not have common understanding of the recommendations, it’s not fruitful to have a discussion of concerns because we’re talking about two different things. So I’m happy to get this clarifying question so that we can understand the recommendation in the same way. And if there’s any debates about interpretation, that is a concern, and we’ll have to mark that as a concern and address it later to see if we can work that out or not.

Okay. First, let me see. I’m going through all notes to the IRT. That was my mark. I’ll leave it there for future. The first thing I see is 7 December. It’s a concern from Alan. Alan, I think you’re saying that question and concerns and considering all these things. Now, is there a specific question? If not, we’ll put it away as to be discussed later as part of the concerns.

ALAN GREENBERG: No, I labeled it as a concern because it's a concern.

DENNIS CHANG: Thank you for concern. And you know what, when I first got assigned, that's exactly the reaction that I had. So I am concerned, too. Let's see if we can work this out together. Thank you. So this is 1.3. And I said let's focus our energy on 1.3, so I'm heading down there, and it's clean so far. Here's Dana's comment. And she's giving us instruction, question, or concern, but is there something here? No? Okay.

Here is Ajith. He labeled this as 1 and 2, a question and a concern, right? And I answered this. Now, Ajith, do you want to speak to this a little bit, just the question part? If you are okay with my answer and this is now considered concerned, we'll revisit this during the concern discussion. Ajith?

AJITH FRANCIS: Thanks, Dennis, for responding to it. Yes, I think both your response and the framing that you did in the beginning of this exercise sort of answer the question. It's also linked to, I think, Alan's concern at the beginning as well. So they're all interwoven. So thank you very much.

DENNIS CHANG: Thank you, Ajith. Hey, Ajith and everyone, feel free to turn on your video. You don't have to, but it would be nice to see you. I saw Volker flash briefly and I was happy to see his face. Yeah, don't be shy. Thank you. And then let's look at this one. This is Jothan. Hey, Jothan, are you

here? Again, 1 and 2, was my answer satisfactory? If it's 2, then we can revisit it at the concern discussion. Is Jothan here?

JOTHAN FRAKES: Hey, Dennis. Thanks for calling me out. I just had to struggle finding the mute button.

DENNIS CHANG: Be ready to be called, everyone, especially if you are the inquirer or commented with the questions. Go ahead, Jothan.

JOTHAN FRAKES: Well, on this, I think there's a variety of different scenarios within what can happen in the real world for this. I'll try to be brief here. But I think it's going to depend on how this concept of accreditation works, that there'll be contracts or agreements that'll follow all the way out to the registrant and even the proxy beneficial owner of a domain name in the situation where the registrar of record for the domain name, sponsoring registrar, and the privacy/proxy provider is an affiliated organization of that registrar, and that probably covers the majority of scenarios out there. However, where you've got a scenario where you've got an accredited registrar and an accredited privacy/proxy provider but they're not the same entity, we've got some gaps with respect to how some of the obligations would flow through out to the registrant, some gaps where the ability to expose that additional data or other things that are kind of described inside this document would happen. And then you've got another scenario whereby you've got an unaccredited

privacy/proxy provider. So combining these, you have one major one that this probably deals with really well, but we need ways to solve the second and third scenarios that I described.

DENNIS CHANG:

Thank you, Jothan. And thank you for talking to me prior and giving me some material. I thought that the visual that you created for me was very helpful. When time comes later, I am going to invite you to share that with the IRT so we can all benefit. Are you willing to do that?

JOTHAN FRAKES:

Absolutely. Yeah. Thank you for the opportunity.

DENNIS CHANG:

We got your number, and we'll put you on the agenda in the future so we can actually discuss exactly what you talked about. This is a very good complete view of what we're dealing with. For right now, the question to your question, "Which SO/ACs are represented?" I think I answered that. If you're okay with it, we'll move on and we'll revisit during the concern, okay?

Michael, this is a concern. Oh, there is a question here too. Let me see. Michael, I think what we've seen you do is you asked a question which we answered, but then I think you revised the question. So it's getting kind of difficult for us to track. So here's what I like you to do. Next time when you do this, please take a word. Okay. Just a word. No, I was looking at this right here. Where was I? I was looking at this, right? Try to limit your highlight to a word or two and make each comment

separately. So you might just do “Working group believes,” and then say, “This is a concern.” And then you may mention the other parts of it, and then you might highlight another one and ask your question number one and highlight another word, and ask your question number two. That way, it’s easier for us to track and address it separately. So would you do that next time? Thank you, Michael.

Let me see what we had prepared for you. There was something about indemnification you mentioned, and this is my answer for now. So if you’re okay with my answer for your question, we have to address the other things that you mentioned during later session in the concern. Do you want to speak, Michael?

MICHAEL PALAGE:

Yes, please. If we can go up and if you look at it, let’s go to the first one to DAAR. So what I did here is I tried to limit one concern and two separate questions to a sentence. It’s kind of hard to limit to one word. Perhaps that’s just the lawyer in me. I need to look at the totality of the sentence that I am commenting. I’m sure we’ll find a happy medium.

If we can, the first question I have here is to DAAR. So there was a recent report that was put out, I think, by the DNS research, and then I think Interisle also put out some stuff that talked about the attribution of abuse related reports in connection with domain names associated with privacy and proxy services. So, to me, that I think is something very material as it goes to the security and stability of the DNS. So instead of relying upon these outside parties, the question to DAAR is, do they have the resources to either confirm/reject that underlying premise?

Because I think that is a very important issue for us as a group to know on a factual basis before we move forward or before we provide any clarifying questions to GNSO Council. So that was my very pointed question to DAAR. Let me pause there before going to my next—

DENNIS CHANG: Yes, let's pause there. So if you have questions or requests for teams that is outside of IRT and us, let's see if we can do that differently. Of course, there is a team at ICANN that deals with DAAR but I have to I think you're asking me to relay your message to the DAAR and pointing out that that team could provide data that we could use. I think that's what I'm hearing.

MICHAEL PALAGE: I think you're accurately stating the request and I think that would be consistent with why ICANN Legal I think has representation on this call, how ICANN Org had other staff support—

DENNIS CHANG: Yeah, yeah, yeah.

MICHAEL PALAGE: So ICANN Org as a whole.

DENNIS CHANG: Yes, certainly. I mean, I have you, right? I have the community to support this activity. So, certainly, any organization functions within the

ICANN Org, we can make that request. So that's a request. We note your request, and we'll follow up. Reg, did you want to talk about this particular item or something else? Let's address this DAAR team request if you want to address it. Go ahead, Reg.

REG LEVY:

Thank you. This is Reg Levy from Tucows. I am interested in knowing from DAAR as well, not just how many domains that end up on their reports are using privacy, or I don't know how they might figure out that a domain is using a non-registrar affiliated privacy or proxy service, but that's a separate question and concern. But also, how many domains—full stop—are using privacy or proxy registrations? Because it is not an indication of abuse directly unless we can correlate that, right? So we don't just need the information from DAAR about domains that are bad that use this, but all domains generally.

I also want to raise a concern about referencing third party reports that should not be within scope of what the IRT is doing at this time. Fine with addressing a question to ICANN Org, but we should not be having any conversations with third party.

DENNIS CHANG:

I completely agree. That's a dangerous area. I do agree, and thank you for bringing that up, actually. Jothan, did you want to point to this? Have a follow-up?

JOTHAN FRAKES:

I do. I think Reg made a point about third party reports. I respect Alex heavily and the DNS Research Foundation and DAAR. I think what this does, though, is it kind of segues into where I highlighted the word knowingly. I want to bring this back to the context of our discussions here about the definitions based upon the charter of privacy and proxy that we have some challenges. I think any reports, whether they're DAAR or a third party, are making assumptions, pretty big assumptions about how they're going to normalize or identify what is privacy or proxy, and I think there's going to be some variation in how that assumption is applied. That's going to be confounding within a system that people expect there to be some kinds of standards in, like the shared registration system that we're all part of that it's going to be very challenging for a registrar to identify, even in the presence of fields that they might be able to do pattern matches on, whether or not privacy/proxy is in play or we're dealing with a registrant. I think that's going to be a place that we need to focus some attention as we work through our process.

DENNIS CHANG:

Yes, I agree.

JOTHAN FRAKES:

I agree with Reg about third party reports. I think we should keep it focused and narrow inside of what we're working on. Thank you.

DENNIS CHANG: Thank you. I'm probably going to talk about the scope a lot because this privacy/proxy is a topic that is so far reaching and is connected to just everything, so it's going to be challenging for us to contain our work scope. Otherwise, we just never get anywhere. Margie, go ahead. You have a question about DAAR?

MARGIE MILAM: No. I have a question about the third party reports. I wanted to see whether it's limited in our charter, because I look at this from a different perspective and feel that the third party reports and DAAR as well are relevant to some of the questions we're asking, especially if you take a look at even Alan's question earlier about is it fit for purpose? And I think the third party reports actually help us decide whether the current policy that we're working on is fit for purpose. So I'd like to ask, is it a prohibited? And if it's not prohibited, I think we should include it and at least explore whether there's some meaningful learnings from any of the reports. I mean, there's probably several reports that are fairly recent that can help us understand the issues related to privacy/proxy.

DENNIS CHANG: Let me answer very clearly, Margie. You know how our IRT model that we're using is an open IRT, right? What does that mean? That means anybody can join this IRT at any time. Why do we do that? It's so that we can leverage the collective wisdom and experience and knowledge of everyone who has something to say about this we can benefit. What does that mean? When you join the IRT and you're speaking as an IRT member, and you're basing your information, that information could be

third party information and lots of research, it has gone on, and things are changing. And then really welcome the IRT to bring that back. So it's not prohibited. What we were cautioning about is that we need to be very, very clear on which data is helpful to us. Otherwise, we get kind of side tracked and we fall into this temptation of trying to do other job that is not the policy implementation that we have to do. So let me turn to Gabe. You made it in. Gabe, welcome.

GABRIEL ANDREWS: Yeah, let's do an audio check. Did I really make it in?

DENNIS CHANG: Yeah, you did. You did. Let me see you. Let's see you do a video check.

GABRIEL ANDREWS: Okay, twist the arm. I clicked the button. We'll see if it actually works yet or not.

DENNIS CHANG: There you go. Okay.

GABRIEL ANDREWS: Thank you. This is Gabriel Andrews. I don't think I've spoken yet for the record. I should denote that while I am listed as a GAC rep, all statements that I make at this point are my own, and that if I ever do speaks explicitly for the GAC, I will explicitly state it at the time, and it is not that time now. Just being very constructive here, I think I should

note that we all might have perspectives that are informed by third party sources, and there is no obligation upon any of us to accept those sources as presented by others, right? So I don't think that it's very constructive for us to try to exclude from conversations, data that may or may not originate externally, but nor should there be some expectation that we all have to accept it. And to the point that some registrars are making that, they would appreciate ICANN information as an authoritative source, well, that just means that it's more productive for us to maybe reference that. At the same time, we speak about some of the other sources of information. I note that in the past, I have gone before the GAC and spoken to in COVID times during those dark ages. How the FBI when we were triaging abuse reports of domains being used in COVID associated fraud, we did see that greater than 75% of those domains were using privacy and proxy services at that time. Whether you consider that third party or first party or what have you, I don't even really care, but that is just one thing I remember and can bring if it is relevant to some folks' consideration. I'll stop there.

DENNIS CHANG:

Thank you, Gabe. Yeah, it is important to know that number is out there, and where is presented, and how it was presented, and that we should maybe leverage the study that was done, and maybe we can benefit. But we'll talk more about that. So if we are done with the DAAR question, I'm going to turn back to Michael. Do you want to address this other question?

MICHAEL PALAGE: Yes. And I even turned on my video for you.

DENNIS CHANG: Okay. Thank you.

MICHAEL PALAGE: To address this second question, I think this was inspired somewhat by Jothan's comments about some of the disparity in service and relationships. So in reading the OECD paper that talked about DNS security, they talked about a very complex domain name supply chain system, and in fact, identified certain parties that do not have contracts with ICANN. So I think this issue of indemnification is very important. If you look at the totality of ICANN's contracts with its contracting parties, registries and registrars, registries have an indemnification provision indemnifying ICANN. Registrars do not. I think if we do move forward with this new contracting party class, that it would be important to have indemnity included in that agreement to safeguard ICANN from a financial and a legal standpoint. So that is why I am addressing that question to ICANN Legal, and why I think it is appropriate.

DENNIS CHANG: Thank you for that. Okay. As I said, I think that we'll have to consider that and address later. Okay. So let's see. Where was I? This question came from here, right? No? This is where it came from. So here I see another question, this time from Gabe. This is a question, right? Well, this is a brand new one. You want to just speak to it while you're here? You did it at 6:52 am today so I haven't even had a chance to read it. But

do you think it would be helpful to just voice it right now? Maybe we can just real quick answer.

GABRIEL ANDREWS:

Certainly. So this is a question that is asking for the general definitions given. I noted that I do not see within this report. So the question is, does the PPSAI PDP Final Report, does it use specified definitions which may exist elsewhere for the terms that are in this report such as beneficial user, which first appears on page six and occurs five times; beneficial owner, which appears on page seven, four times throughout; licensee, page seven, four times, registered name holder, which occurs 20 times; and registrant, which appears in page nine and occurs 66 times.

DENNIS CHANG:

I saw a similar question from someone else, and that question really was to the original PDP Working Group, if they had any kind of design or agreement back then, and if the definitions were provided to work with. So can you hold that question until we come to that other question? And maybe at that time we can have the PDP Working Group members answer that. This reminds me. Let me show you this. We didn't really know who to reach out to. So the Meeting Attendance page, as you see here in our workbook—and you can see, everybody—and we're up to 56 right now. Owen just joined. Owen, I don't know if you're here, but thank you for joining. What we've done is we created a couple of columns, D and E, and we noted questions popping up and saying, "Hey, PDP Working Group of the PPSAI original Working Group, could you

provide this answer?” We didn’t know who to go to. So I think I had everyone raise their hand at the Kigali meeting, and there was like a handful of you who raised their hand. So I think we’re fortunate to have them. So if you could self identify and say, “Yes, I was a member of the PDP Working Group,” so we know that we could reach out to you if we need an answer and get your attention.

And the same thing, the other thing is the Transfer Policy PDP Working Group that’s ongoing right now. I mean, I know Roger is a chair of that group and we are fortunate to have him with us, but if there are other IRT members that are also on that PDP Working Group, I ask you to self identify by putting a Y next to your name in this column. Is that okay? Thank you.

Okay. Back to Gabe. Sorry. I don’t know if I cut you off or where you were going with the question.

GABRIEL ANDREWS:

I’m okay with it. I’ll just note that there was then a concern underneath which you can address later. Sorry for conflating. I think several different things in the same chat bubble. But then again, a question that came underneath the concern. I’m going to be ready to proceed to that one.

DENNIS CHANG:

So let us take some time to read it again carefully and see if we can formulate an answer to this comment directly after the meeting, and

we'll let you know. You'll get a notice, I think, when we post the response. Let's move on that way. Thank you, Gabe.

GABRIEL ANDREWS: Sorry to jump in again. But then, just before you leave that same chat bubble, I'll note then that there is one more question I have there which is—

DENNIS CHANG: There is?

GABRIEL ANDREWS: In the same. It goes 1, 2, 1. In the future, I will endeavor to break them up into separate chat bubbles to avoid that risk. So the final question there is which of the terms, if any, identifies the role of the entity who is legally responsible and perhaps even culpable for how that domain is used? That's something that I'm not sure I have clarity on when I read these terms used in this document. I'm not sure if there is clarity in the community, but to the extent that we can have clarity on that, I think would really help our conversations.

DENNIS CHANG: Oh yeah. I agree with you, yeah. The definition and terms is perhaps the most challenging thing that we have. I would like as much as we can to come to an agreement before we delve into any kind of design of the implementation. A lot of things that we're talking about will be sort of based on how we design the implementation. So, for that, we'll have to

wait because we have not done that yet, and we will do that when the time comes after knowing, having clarity on the recommendations language and addressing your concern. Jothan, go ahead.

JOTHAN FRAKES:

I want to plus one Gabe on this, just to say that having some sort of a commonality in our terms is going to be very, very helpful. Then I wanted to comment that somebody threw a Z in the word knowingly, and it's been bothering me because I'm staring at it on the screen. Thank you.

DENNIS CHANG:

You're staring it on the screen. Am I showing it now? It's coming up. Okay, next one. Okay. So we're done with this, Gabe, so we'll address it. And then we'll continue. Let's talk about knowingly. John, okay, go. This is a very interesting topic, and I gave you an answer. What do you say? Go ahead, Jothan.

JOTHAN FRAKES:

I think I covered some ground on this, so I don't want to leave room for other people with time. But can you take that Z out? Just please. It's driving me absolutely batty in the dock itself.

DENNIS CHANG:

I cannot do that. I will not do that. I cannot do that because the rule is the Final Report language as is cannot be altered. We have no authority,

no matter how minor it seems and so obvious it seems, we are not to change it.

JOTHAN FRAKES: Oh, Dennis, I think, though, a lot of us were granted edit rights when we first did this, and I suspect that it occurred in that brief gap. I don't think it was in the Final Report.

DENNIS CHANG: Oh, really?

JOTHAN FRAKES: Yes.

DENNIS CHANG: Then we need to recover.

JOTHAN FRAKES: I think that's just a typo.

DENNIS CHANG: Oh, okay. So let me do this. We'll take that on, make sure that we confirm that and fix it, too.

JOTHAN FRAKES: I think it could also be stretched to fit the magic spells used to identify whether privacy or proxy is in place, right? I think that's the challenge that I had identified there. So perhaps we're using a magic wand, and that's the magic spell name that we say as we point the wand. Thank you.

DENNIS CHANG: Thank you. Everybody, you read the answer that I provided, this is going to be tough, and how we address that. What we're saying is the previous IRT have, I think, considered this. We will see if we can leverage the work done by the 2016 IRT. Let's move on to the next one.

Michael, question. This one says accept registration. ICANN Legal, what will the consequences be due to accepting? Okay. This is a consequences of accepting. So here's a long answer. I think it's rather complete and comprehensive, but basically it is the same thing. We do what we do and they get what they get. Same process. There is nothing we're changing with this policy implementation on how people do not comply with the policy. Is that okay?

MICHAEL PALAGE: I think for now it's okay. I do think we will probably want to come back as we dig deeper into some of the points that Jothan has raised regarding the complexities of some services that are not directly affiliated with existing contracting parties. I think that will be important to address, and I think this actually touches upon some of the comments that Steve Crocker and I made about perhaps labeling privacy/proxy registrations through RDAP or through EPP, so that it

could be properly flagged and audited for purposes of ICANN compliance and others. So I think this is something that, as a group, we will need to discuss later on, and for now, I think it's sufficient. So thank you.

DENNIS CHANG: Thank you. Hey, Jothan, do you have input on this?

JOTHAN FRAKES: Just a new hand here. The ability for this to be more binary would be incredibly helpful, I think, for all parties. I can't think of a party for which having a registration being identified as privacy/proxy or not would be incredibly helpful. The question will be, as a registrant, and you're using a third party service, we'd have to treat as registrars the registration as this being a registrant unless either, A, it is our own affiliated registrar, or B, the registrant has identified they're using a third party privacy or proxy service. Period. That covers the universe. And the place it still gets sticky is where the use of another accredited privacy/proxy provider, but that's a whole separate ball of wax. But we don't have a way otherwise to knowingly fulfill the definitions of things outside of our own privacy/proxy service that might be affiliated. We need to put some focus and attention into this. If we are doing something where we have to alter the RDAP or other areas, that might require us to work with somebody with the IETF to redefine some of the protocols. Thank you. Thank you.

DENNIS CHANG: We will, yeah. Most definitely. Margie?

MARGIE MILAM: Hi. I wanted to respond to the question about how do you know whether it's a privacy or proxy provider, because I think that's a really useful question. I don't know. Are we planning to have a separate conversation about that, or should I provide my comment now?

DENNIS CHANG: Yeah, if you have a quick answer, let's hear it.

MARGIE MILAM: I envision that the accreditation list that ICANN provides would be the list that you refer to to identify whether they're accredited or not. So that's something that can be part of implementation. The other thing I think people can think about is that if the name of the registrant uses the word proxy or privacy, those are two obvious ones as well where you'd be able to identify those. So I think there's certainly solutions that we can talk about and implementation solutions that would address the concerns that Jothan raised. Thank you.

DENNIS CHANG: Steve?

STEVE CROCKER: Thank you very much. Just continuing on this point, there's tension, sort of a collision, between what would you do if you did it right versus how

do you struggle with the structures that we have at the moment? So let me be clear about that. If you're going to do it right, at least from my point of view, you would lay out the distinct cases. One distinct case is that you have a registered privacy or proxy provider. Another is that you have a known, quite visible privacy or proxy provider, but they're not registered. Another case is that there's a privacy/proxy provider but you don't know that they are because they don't identify themselves as such. Then, of course, you have registrations that don't have any privacy or proxy provider involved. So I've just laid out four distinct cases. We do not have an explicit representation of these four cases. What we have are fields that have been previously cast in concrete called registrant, and now we're trying to overuse those fields to encode the information on these four cases. This is almost certainly guaranteed to be, at very best, only a crude approximation and more likely to raise problems as we go forward. So the objection that are going to come up quickly from almost everybody is "Oh, but we can't go change the underlying system because that's a big implementation problem." Well, yes and no. You can't change the underlying implementations immediately, but you can change them over time and it's not a insurmountable issue. It's a bounded issue.

So I would say that the right path forward is, first of all, get the concepts laid out clearly and make them distinct and distinguished. That is almost zero cost because you just have to get the vocabulary right. Then you have the question of how do you map those, both in the immediate situation where you have limitations on what changes you can make, and in the in the eventual situation, what should the implementation look like? Now, those will be different. The immediate one will have the

approximations and the make do kind of arrangements, and the eventual one may be different where you add fields that have an explicit designation. And so then you have to plot a transition path which may take a while, a while measured in years, but not decades, in order to make it all smooth. All of that is, in my opinion, exactly within the scope of implementation management, which is what we're about here. It is not a question of creating new policy. It's a question of dealing with the realities of implementing what the facts are. But getting back to my key point is in order to do that with a clear head, one has to make a distinction between what the concepts are that you're trying to distinct versus what the encoding processes are which are separate. And there's a mapping between those two. But unless you get a clear statement of what the concepts are and a separate, clear statement about how those are encoded, both now and in the future, then we're going to be talking past each other, we're going to be ignoring pieces of it. That's the speech and I hope that we can focus our attention in that way. Thank you.

DENNIS CHANG:

I know exactly what you're talking about as an engineer, that you're talking about really what I consider implementation design, and we will get there. Jothan addressed the different categories, if you will. I forgot what he called it, scenarios. You laid out four which is, I think, accurate. So, Jothan, maybe you can take Steve's note and work on your slide to maybe include all four so we are looking at the same thing. But thank you for that. Take notes, and we will get there. Next item is—oh, we have Gabe. Go, Gabe.

GABRIEL ANDREWS:

Just two reactions. One, I put in chat, but I'm going to verbally state this as well. I agree wholeheartedly with Steve in the express needs to talk through the various scenarios that exist, and both those that exist now that he enumerated, but also you can sort of envision this future scenarios where there's more than one proxy provider, or how do you have scenarios in which there are resellers and proxies combined, etc., etc. We need to enumerate those in order to be able to speak to them using a common set of terms, as I alluded to previously, and make sure that when we use words that we're using in the same way.

Secondarily and separately, I don't know if it was Margie that commented on how existing text fields are or are not scratching the itch in terms of identifying when proxies exist. I want to firmly and loudly state that right now they are not text fields that are user editable, are neither sufficient nor necessary in order to denote the existence of a proxy, they cannot definitively show a proxy service in place. I can illustrate that if needed, but we should not rely upon user editable text fields at the registrant data element to be authoritative in terms of whether or not a proxy exists. The PPSAI report here actually has a footnote that contemplates additional data elements. And now that we've seen the implementation of RDAP, we all know that it is actually contemplated within RDAP itself to extend new data elements, and that is something that is already accounted for within IETF engineering. So we should very, very keenly look to how extension of RDAP elements can help to address some of the roles that we might then see identified within those models that Steve has articulated us to and assigned us the job of drafting.

DENNIS CHANG: Thank you. Yeah, again, implementation approach and our need for common language before we can start talking about implementation. Let me go to—who's next? Gabe after—

GABRIEL ANDREWS: I'll drop my hand.

DENNIS CHANG: Thank you. You showed up again. Oh, this is Alan. Hi, Alan. Go ahead, Alan.

ALAN GREENBERG: I'll turn on my video also. Just a brief comment. Several people have enumerated the types of proxy providers' situations. There's one more that was alluded to by Gabe in a comment in the chat, but I think it's an important one that we're going to have to talk about eventually, and that is entities that are proxy providers apparently under our definitions here but don't consider themselves proxy providers. The classic example is a lawyer acting as an agent for their client. They're not in the business providing proxies. They don't offer to the public, but they are, in fact, registering something in their name even though the beneficial user is their client. If we end up considering them as proxy providers, as I believe the current report envisions, the situation gets exceedingly ugly. So it's one of the things we're going to have to consider. It's important not to omit that case. Thank you.

DENNIS CHANG: Agree. Thank you. Just so you know, the chat is going on. So that you know, I can't be tracking the chat, but I will read all the chats after the meeting. But if you need my attention to what you're saying, please raise your hand and speak up right now. Thank you.

So this one is addressed and the next comment is also from Michael Palage. This is a concern, OECD paper, and you marked it as a concern, so we're going to note that and skip it if you're okay.

Then next one is a beneficial owner. Oh, here, yes. This is what I was remembering that Michael had asked the question, kind of the same question, right? We are defining beneficial owner, beneficial user. So this is unclear to me either. So this is where I was inviting the PDP Working Group that had written—they wrote this, right? And the people who are self identifying—no one has yet—but the people who were self identified as a PDP Working Group should answer this question because I would rather not be guessing at what they were thinking. So take some time, and later on, if you come back and add your reply here, we would all greatly appreciate it. Thank you very much.

Next item is Margie, it's a clarifying question. Then Margie and John commented also. I think that I did provide an answer here. Margie and John, was this okay as an answer?

MARGIE MILAM: Yes. Thank you.

DENNIS CHANG: Thank you. Okay. Next we will go to here and relay. Michael noted a concern about the relay, and it's a long concern, and we will note the concern and discuss it later. Thank you.

Next item. Okay. I just noticed what we did is we finished the Recommendation 1. We looked at everything or the comments in Recommendation 1, and we addressed the clarifying question. New question, we did not answer and we will. And then there were several concerns we noted, and we'll come back later. Now, pause. How's it going so far? Is IRT Okay? Am I going too fast, too slow? Is the pace correct? Reg, you're my pace keeper.

REG LEVY: You're doing great.

DENNIS CHANG: Thank you. So then shall we move on to Recommendation 2? Okay. Let's go. Recommendation language #2—oh, this is tricky. Okay. Try not to do what had just happened. Somebody highlighted this, right? And another person highlighted this word. So it's really hard to see that. So if you don't mind, if somebody highlighted this and there was the word that you wanted to highlight, just highlight the next word and just say that you're referring to the other word or something, so it's visually easier for us.

So let's talk about this one. Okay. This is Paola, a concern as marked. So we're going to note this. Let's see. Luc had commented on it, too. So I

think we are going to address it later. So that's good. So we'll do that. And this one is Michael's concern also marked as concern. So we note the concern and we'll address it later.

Next item is Recommendation 3. Jothan, just a reminder, I know this is probably not clear when you did this. Don't try to highlight the entire language but just highlight a word, so that we know there isn't another comment that's hiding there, Jothan. And this is kind of interesting. Steve resolved it, and then Leon reopened it. Michael resolved it, and Michael reopened it. So I think this is a part of our learning process, maybe, and that's okay. This is kind of a good test. So I think there was a concern earlier that what if somebody resolved it by mistake? We'll never see it. It doesn't happen. We can always recover, and we're tracking all these changes. And this is a really good test of that that it works. Jothan, do you have a comment right now? It's a question, isn't it? Do you have your question answered?

JOTHAN FRAKES:

Maybe. But I just want to go back to the paragraph part. Yeah. I think doing the word would help. I think there were two different accidental resolutions where people were maybe trying to comment. So I think your note on just doing individual words is helpful as an approach. I don't think we had that in place when I did this. Thank you.

DENNIS CHANG:

Okay. So just read the answer, and if you're okay with it, we will note it and pass and move on. Next item is Recommendation 4. The Recommendation 4 has a question from Steve Crocker and Michael plus

one on it, and we provided the answer. So this is again a PDP Working Group question. I noticed the PDP Working Group is not responding, and we are going to have to be maybe more clear. We may need to do maybe a separate follow-up and make sure that the questions get answered. So we'll do that. And again, self identify please. Otherwise, we will have to do the homework ourselves and try to get list and see if we can identify you. Thank you.

Next item is this. This one is a suggested spelling, okay. Okay, John, addressed it as a concern. Gabe followed it as a question and a concern. So this one was done yesterday. I didn't see this. So we'll have to come back to it later. When we come back to it, we'll try to answer the question part. So do you want to just talk to the question part only, Gabriel, for now?

GABRIEL ANDREWS: Sure.

DENNIS CHANG: Is this a question to us or is it a question to John? Who's the question for?

GABRIEL ANDREWS: The question is for all of the IRT. So if you scroll back up just a little bit so you can see the whole of the statement. To the extent that is feasible, domain name registrations involving the services should be clearly labeled as such. So my question was just in order to actually implement this as a suggestion. To whom are we making that record

clear? Are we making it clear so that the ICANN experts can clearly identify that there's a proxy in place? Versus are we making it clear that the general public can? It's just to call out that if you don't have that in mind, then we would have asked the different implementations.

DENNIS CHANG: Something's going on?

DANA KUEBLER: We can still hear you.

GABRIEL ANDREWS: So I stopped speaking—

DENNIS CHANG: What happened?

GABRIEL ANDREWS: Did you hear me all?

DENNIS CHANG: No. Some sweet voice said, "I'm still listening," but I didn't hear you.

REG LEVY: Yeah, I heard him all right.

PATRICK FLAHERTY: I heard you, too, Gabe.

DENNIS CHANG: Okay. I don't know, maybe—

GABRIEL ANDREWS: So I don't need to repeat myself then. But I put that in as a general consideration for us as we seek to implement that in the future. So that's all. No further—

DENNIS CHANG: Thank you. I'll listen to the recording because it cut out for a while. So that's good. Thank you.

Next item is Recommendation 5. Michael has a question and a concern, and we try to answer the question for DNS Research Federation. Okay. I think you mentioned there's a lot of good work out there that we should leverage, basically, and I agree. So let's come back to this when the time for that is right. Are you okay with that, Michael?

MICHAEL PALAGE: No objections.

DENNIS CHANG: Thank you. Number six, we are talking about mandatory provisions to be included. This says mandatory. So when I see things like that from the Final Report, I like it, because I know that translates to must in my

policy language. When I see words like should, then it's very difficult for me because I don't know whether should was meant to be a must or may. So we're talking more about must and may language as terms that we will use in developing the policy language. Let me just make sure what I'm talking about here. What we're looking at right now together in the Final Report are recommendations language, and this is what I say. I use those terms. We are looking at the recommendations. They're not the policy language. The policy language is something that we will have to write. It doesn't exist yet. We have a sample of what the original IRT did, and we can leverage that, but we need to produce every word of that policy language and review it together. And within that policy language will be a list of definitions, keywords, and these are all going to be spelled out exactly how it will be used for our policy. That is a work to be done. So it's a good thing that we are together answering these clarifying questions right now, because that will help us be more efficient and be precise about the policy language.

Okay. Let's move to Recommendation 6. Thank you for highlighting one word: handled. Okay. About the whole recommendation, I'm sure. But Michael has a question and in light of potential use DNS abuse. Okay. I provided the answer. This was not recommended by the PDP. I think maybe it's outside of scope, and I said that. And of course, if the community wants it, the community can develop a policy. And then Michael followed up. Okay, Michael, why don't you open your mic and let's talk about this. In scope, out a scope is always an important question because that will guide us in doing our work. Go ahead, Michael.

MICHAEL PALAGE:

Correct. Obviously, I think Owen had spoken to this in the chat earlier about this is a PDP; we're not supposed to be changing things. I think the point that we have to acknowledge is the GDPR happened and was implemented. There are certain things that have happened that have impacted I think the work that we are doing. I think it is in our best interest as the community to reflect that. If what we're proposing to implement is not inconsistent with the policy, I don't see any reason to see why that would be prohibited. I guess that's the question that I'm raising there to get some further guidance. If there is silence, I think we have the ability to interpret how to go about implementing that. I think that's kind of how ICANN has done this to date in its IRT work. And if not, Dennis, if you could correct me, I think it would be really good to have this discussion to address just a lot of the other issues that may arise.

DENNIS CHANG:

Yeah. I think it's an important discussion for our work scope. When we use the word it's not inconsistent, when I think of that, there's so many things that I'd like to do. I'm an engineer. I want to design, right? I can visualize how all of these things work. Oh my God, this will be great. You have no idea what John Crain and I are sitting there in the corner and dreaming about the future. It's not inconsistent with our recommendation. Therefore, we should do it. Steve Crocker mentioned that maybe we have an opportunity to do some really good things and some of that can be done right now within the policy because the recommendation requires it, but then maybe we can set it up so that we can build on that as we go using other vehicles. So very important discussion and we need to continue talking about that, but we need to

be very, very specific on the cases and the work that we are talking about. This is really hard to do. Whenever I hear we should do this, I'm asking the question, let me see if I can find the recommendation language that I can point to as the "authoritative source," "authoritative anchor". I use the authoritative anchor a lot because it's not Dennis Chang made a decision, it's the PDP Working Group made the decision, and Board approved that decision and directed me to implement it. That's how I think, just so that you know. Reg, you have the floor. Go ahead. Reg,

REG LEVY: As much as I would be delighted to take the floor, I think Alan was in front of me.

DENNIS CHANG: Oh, Alan. Go ahead, Alan.

ALAN GREENBERG: Thank you very much. And thank you, Reg. Two related comments. If we go back to the GNSO and develop new policy, we're making the 10 years that it's taken us to get here into 15 by the time anything gets implemented. We say ICANN is slow, but 15 years is pushing the envelope. If this was consensus policy, that is a policy that alters an existing contract, then we have very rigid Bylaw defined for how to develop that. This is not consensus policy as such. It doesn't alter existing contracts. It gives us more flexibility if, as Michael said, we can do things which are not forbidden.

DENNIS CHANG: Alan, are you one of the original PDP Working Group?

ALAN GREENBERG: I am not.

DENNIS CHANG: You are not? Okay. You just said this is not a consensus policy?

ALAN GREENBERG: It's not consensus policy as defined in the contracts. That is policy that alters an existing contracted parties' contract. There are no existing contracts. It's not altering anything. It's Policy, capital P Policy, but it doesn't alter existing contracts. That gives us more flexibility in how we work and if we choose to use that flexibility.

DENNIS CHANG: Okay. Let me just make sure that we use the right term. So visualize this with me. Okay, consensus policies. Okay. These are consensus policies, right? This is what I call consensus policy. And the last one I did with the Registration Data Policy is on the list. The one before that was the Interim Reg Data Policy, and then one that before that was IGO/INGO. And before that, it was Thick and so on. These are all consensus policy sought.

ALAN GREENBERG: That's correct.

DENNIS CHANG: My expectation is when we develop this Privacy/Proxy Policy, it'll go on this list of consensus policy. Do you not agree with that?

ALAN GREENBERG: I'm sorry I misspoke. The parts of our policy that will govern what registrars have to do is consensus policy.

DENNIS CHANG: Right.

ALAN GREENBERG: The parts of it that govern what privacy/proxy providers do is not because it is not altering an existing contract. So there are aspects of what we're doing that is capital C, capital P, Consensus Policy. There are parts that are not consensus policy because those aspects are not governing existing contracts.

DENNIS CHANG: Wow. That's a subtle—something that I had missed all this time. Oh, wow. I need to talk to you more about the word consensus policy.

ALAN GREENBERG: I'm sure people will disagree with me.

DENNIS CHANG: I would have but I'm going to pause and think about that. Hey, Reg, go ahead. Your turn now, right?

REG LEVY: Thank you. Dennis. I wanted to go back to something that Michael Palage said. He indicated that GDPR has altered the landscape since this has been published. And then Luc says something in the chat that I really just want to draw out, that we can't ignore the recommendation definitions, but given the changes to the regulatory landscape, it may be something that we need to consider that we need to go back to the drawing board with regard to some of these definitions since they're simply untenable at this point. Thank you.

DENNIS CHANG: Yeah. I don't know whether you mean this, but what you just said is significant to me, that when you say go back to the drawing board, which drawing board? If you mean the drawing board of the PDP Working Group drawing board, that is "going back to the GNSO Council" as a threshold question, and we need to put that on the list of the—

REG LEVY: That's correct. And I don't say that without understanding the implications of what that is. I also want to call out that Paola Monaldi mentioned something similar in the chat that the current definitions for privacy providers and for proxy providers simply just don't make sense anymore.

DENNIS CHANG: So current definition—I'm just the sub. Forgive me. Let me go back. When we are talking about current definition, we're actually talking about Recommendation 1. The point that you made did not come out strongly enough, I think, when we were talking about Recommendation 1, but we noted now. I think what we will do is start capturing—and I'm going to call it just candidates for the threshold questions and start making a list as we go. My vision is we're going to have a long list. What we are going to do, what we'll attempt to do is try to see if IRT can resolve those questions on our own. And if we all agree, we just cannot. Those are the threshold questions that will go back to the GNSO. I think you're with me and I think we're together. So let's go to the next. Margie? Go ahead. Margie.

MARGIE MILAM: Hi. I wanted to address the issue of whether this is consensus policy, consensus policies much broader than just what affects the contracts. And I think you look to the Bylaws to say that. I mean, if you take a look at the Bylaws and how the GNSO's set up, it's talking about GNSO's authority to make recommendations for policies that affect generic top-level domains. So I just I want to at least get some guidance from staff on that point. But that's how I understand it, that it is much broader than whether it affects the contract. So I want to limit the work that we do here.

DENNIS CHANG:

I think that that's not a bad place to start, isn't it? What is the consensus policy? Okay. Let's make sure that we don't forget the "obvious" words that we normally use. We think that we mean the same. And this is precisely the reason for this exercise and it's all coming out. I'm glad to see we should actually capture that definition of consensus policy in our document and all look at it and all agree, yeah, that's what we mean when we say consensus policy. Gabe, you're next.

GABRIEL ANDREWS:

I have a question for us all in terms of how we are going to handle some of what I see is self-assigned work. Just as one example, Reg, I see you and some others talking about how there might be work to update or at least add modern context to definitions such as proxy providers. And I think that's very useful because I think you have much better insight in terms of how that operates on a daily basis, and I would love to see how that differs from what was put in this 2015-2016 report here. Secondly, I've heard that Steve and Jothan were talking about models like to make clear certain landscapes or ways in which registrations are occurring and what various types of roles can exist. How are we tracking that? Are we just self-assigning this work and then coming back and then interjecting it where it's helpful? Or are we going to specifically have this as something that's tracking the work document that, hey, we're doing A, B, and C to help clarify these issues. Because I think some of these are great and I don't want to lose sight of them. If, God forgive me, Reg gets hit by a bus, how are we making sure this is—

DENNIS CHANG:

No, no. What if she wins the lottery and goes away? You want to use that instead of the bus. Okay. This is very good work process question, and I've been thinking about how we do this. So I talked about, let's capture all the candidates for the clarifying questions on a document. That's one. Then the other is let's capture all the ideas for implementation. I don't want to miss all these good things that are coming out. I'm not going to do any assignment to the IRT in terms of implementation right now. That will come later. But for now, if you should so wish to do so on your own and with a small group out there, please don't wait and you can do that, and we will create yet another document. And we'll be sharing all these documents together in the IRT order. Let me see where we are. Yeah, here. No, it's right here, isn't it? Yeah. So this order is going to get lengthy, and we're going to have everything that we create and produce here to share. Now, that's what I'm envisioning right now. Does that make sense?

Our work plan, let me just review our work plan again. So we have work plan, and there are places where we have education on current privacy/proxy environments. This is exactly what I was thinking about, what you just said, and what Margie was bringing up, we want to hear about the realities of today. What is really happening out there so that we can be educated and produce a policy that is practical for today's work. So these education sessions will be important, and this is where I was looking for volunteers. Jothan already volunteered to share his experience, so we have him. We'll call for volunteers as we go, and we'll make a note of your future contribution. Jothan, go ahead.

JOTHAN FRAKES:

Thank you, Dennis. As I go through and I review this, it looks like there's a very good plan put here. I often, and exposed in working groups, have, I guess, realized the wisdom of your approach afterwards, that it was inclusive of things that I had wanted to call out individually. But I think I'm hearing in the chat here that there's probably some areas where we go through and flag where there's been parallel evolution or changes that have occurred while this PPSAI was in the freezer for over a number of years. Did your vision of where we go through and we flag the clarifying questions and we go through the process we're going through now, was your vision of it that we would leverage this process to flag those areas where things had evolved elsewhere? Or was there another phase where we might go through and do that?

DENNIS CHANG:

No. We are going to do that as part of our sharing of our analysis, concerns, and educating ourselves on the real environment. We'll give ourselves enough time so that we all have a good understanding of the practicality, and then this is where we're really going to deal with it. Can we, now that we all understand the recommendation language in the same way and we have our concerns addressed and know the realities of today, can we deal with these threshold questions and resolve it among us and say, "Yes, we have an implementation path. This is the approach, and we can do this IRT within us," or we all agree we just cannot go on without having this particular question answered quickly or resolved, and IRT is not the place to do that. It has to go to the GNSO, and the GNSO will have to give us guidance on how to handle this. So let me just give you a quick reference. And those of you who work with me on the Registration Data Policy, they know how I do this. So what we

had done for the Registration Data Policy as an example, we created a document called Drafting Errors and Implementation Interpretation. So when we came across a language that we all agreed and said, “You know what, that was a typo,” or “No, it says that we have to do this.” But what we meant was may and we have support from the original PDP Working Group. Yeah, that was it. Then what we did is we documented it. When we went off for a public comment, we told them “This is not in line with the language of the Final Report, and here’s why we interpret it this way,” and that worked really well. There are cases. There were cases where we couldn’t do that and it had to be escalated to GNSO, and even ultimately, to the Board. So what our job is separate those things, right? What can we handle at our level? Because they put us here together to do the work, let’s do as much as we can. If we do have to escalate, then the person—Thomas is our liaison. Is it Thomas? No, Paul. Paul is here. Hey, Paul McGrady. Okay, I’m glad you raised your hand. This is perfect timing. I’ll turn it over to Paul. Paul?

DANA KUEBLER: We have four minutes left, you guys, just heads up.

DENNIS CHANG: Thank you. Thank you. Okay, Paul. Paul, you’re our GNSO liaison. I was just about to say that. Go ahead, Paul.

PAUL MCGRADY: When we say escalate or return to the GNSO Council, step one of that is not anything formal. You guys will give me the list of things you think

you can't handle, and I will socialize them with Council, and we will come back to you with initial thoughts. It's not like you guys are going to package them up in some 20-page document and start some formal process for the Council. There'll be a lot of back and forth, and so we'll just move everything up to discussion with the Council and back to you guys as fast as we can. Thanks.

DENNIS CHANG:

Thank you, Paul. I'm glad that you're here. The GNSO Council liaison has the freedom to go back and forth with anything at any time between us and help us move things along. We have two liaisons, Stephanie and Paul, and we will depend on them to listen to everything that we're doing, monitor everything. And when they feel that something could be quickly resolved and help us, they will do that. Okay. That's great. Thank you.

Thank you for the time check, Dana. Let me just see if we can close this side of Recommendation 6. Michael, if you're okay with it, we could stop here. I know our goal is to get to number seven but I want to stop at number six because—let me see. No, it is a question. I do want to respect Steve with enough time to deal with this question. So I want to turn number seven into our next session.

So if that's okay with everybody, and if there isn't any more comments, we will go ahead and close this session and continue our discussion on the e-mail and then on the dock, and we'll communicate more as we go. So thank you very much for participating, supporting. It was a great call.

A lot of good things came up. We have a lot of work to do. So I'll see you all in a couple of weeks.

UNIDENTIFIED MALE: Thank you, Dennis. Thank you, everyone.

DENNIS CHANG: Okay. Thank you, everyone. Bye.

STEVE CROCKER: Bye-bye.

[END OF TRANSCRIPTION]