
BRENDA BREWER: Good day everyone. Welcome to the NCSG monthly policy call on 14th November 2022 at 11:30 UTC.

Today's meeting is recorded. Please state your name before speaking and have your phones and microphones on mute when not speaking. Attendance is taken from Zoom participation. And I will turn the meeting over to Tomslin. Thank you.

TOMSLIN SAMME-NLAR: Thanks, Brenda. Welcome, everyone, to our policy committee meeting. Today, I wanted us to look a bit more into some items on the Council agenda, because there appear to be quite a bit of items that require decisions on Thursday, or given our consent. So I wanted us to discuss these items today. So hopefully, many councilors are joining the call today because this will be important for them to participate.

But let's jump into it. The first couple of things I wanted us to look at today were two items that were on the consent agenda for the Council meeting. The first one, I guess, is not really something that we'd have any contention to, which is the acknowledgement of John McElwaine to serve as Council liaison to the rights protection mechanism IRT.

But the second is something that I think has brought about a couple of conversations on the Council mailing list and I wanted us to discuss whether we were okay with it or not. And I was hoping I will say see Farrell here too, because he is the Council liaison to this EPDP group—working group. So I thought he'll be here to help with this.

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But in a nutshell, I'll give a bit of background to this just so that everyone understands what is happening with this project change request. There is a significant change from the original project plan that was submitted by this EPDP. In fact, I believe they were supposed to submit their initial report first half of next year, first quarter of next year.

But initially being part of this working group until I couldn't deal with the very late hours that the meetings are held anymore, the team has actually realized that the topics under discussion are quite complex for an average volunteer and require quite a bit of technical knowledge which has made them to go back to do some more research every time they meet. And oftentimes, they have to reach out to specialist communities to provide input as well. And oftentimes, they have no control of when this feedback is returned. Sometimes they go to the SSAC for them to understand what they think about certain items.

Due to this, they've realized that they cannot meet the timelines they had set for themselves initially. So what they are proposing and what this change request is about is they propose to separate the work into two phases. The top-level domain charter questions to be addressed in the first phase, and the second level charter questions to be addressed in phase two.

Now, obviously, that comes with different timing of the reports, because they also propose to submit the reports at different times. So the proposal is to submit the initial report for public comments in April 2023. And so that will only address charter questions for top level internationalized domain names. And the initial report for phase two

will be submitted in April 2025. So if I'm not mistaken, there are about 30 months' deviation, from the original timelines that the leadership of the EPDP had submitted.

Now, there have been questions and discussions on the Council mailing list regarding whether there is impact on when the next round of subsequent procedures will be held. And that's something where I think there were some requests for Farrell to take back that question to the EPDP leadership because I understood the change request to address that. It actually mentioned that the IDN top-level domain charter questions were directly related and tied to when the subsequent rounds will be held. But the second-level implementation could happen later. But others in the Council, other councilors understood it differently. So we needed some clarity from the leadership of the EPDP.

So that is, in a nutshell, the story about this change request. I don't know if anyone has any comments or questions to make, considering that I don't see Farrell here in this meeting, so I don't think I have or we have any feedback. I haven't heard from Farrell on the Council mailing list regarding any feedback from—I think someone I remember is a member of the EPDP team is Emmanuel. Sorry for missing that. If you have any comments, please, the floor is yours.

EMMANUEL VITUS:

Okay, thank you very much. So from the discussions, as you said, the idea was to anticipate—because if you look at the charter questions that have been addressed so far, and looking at the initial timeline that was designed, I think the team came together and realized that it's not

achievable within that timeline. So we have to now not just ask for extension but also start prioritization. Because if you look at, let's say the last set of questions, like regarding the string similarities, the time it took for all the stakeholder groups to come with their feedbacks, it took a very long time for them.

So the idea is to anticipate but also give a certain priority to the hot topics. So not following a linear, how do you call it, agenda as the whole group started doing it.

And one thing also is that for some of the questions, they need to create small working groups to think about it. So sometimes it takes more time before they will come and propose to the EPDP group, before the group will now ask all the stakeholder groups to bring their opinion or feedback regarding that.

So when we look at it, it is taking a very long time. So I think the team has prepared a rationale behind this extension. I don't know if you have access to the rationale. There's a note that was sent to the Council explaining why all these exchanges are going on. But I think it's not really optimistic to meet the deadline. That's the main reason why we are anticipating. But the objective is also to make sure that maybe we finish before that timeline, but put the maximum—going up to 2024 is like the maximum they took so that they can actually be able to work on all the charter questions.

TOMSLIN SAMME-NLAR: 2025, actually. I think the only pending question—and councilors, I think, including NCSG councilors, we haven't discussed this before in

terms of whether we support this. I know personally, I do support it, but we haven't discussed it before. So this is the first time we're actually discussing this, whether we support or not.

But the question, I guess, that was key to a couple of councilors was whether there is impact to the next subsequent procedure round. And I don't think that has been answered yet. So I don't know whether you discussed that during the EPDP meeting this week, rather last week, or not? I don't know if you have any insights to that. Emmanuel, if you're still there. Manju, I see your hand is up.

MANJU CHEN:

Personally, I support the extension too. I felt the reasons are reasonable. And I think I understand that as you do. I don't think the second-level domains are as impactful to the launch of next round of top-level domains. So they break up to two parts, which makes it more easy to just push the whole new gTLD next round thing. And I personally will support it, but then if Paul kind of raises concern during the meeting as to, for example, delay the vote for the next meeting, I wouldn't strongly oppose that either, because I think it's always good to have more clarity of whatever we are not agreeing on, on interpreting their explanations and rationales. So I guess we can support it. We don't have to voice our dissent. But if someone was like, "Oh, but I will have to think about it, maybe we can delay it for next month," we won't be like "No, we have to vote now," either. So that's, I think, how we can approach it. Thank you.

TOMSLIN SAMME-NLAR: Thanks, Manju. Emmanuel, I don't know if you can hear me now. I was typing the question, but if you can hear me, I will just ask it.

EMMANUEL VITUS: Yes, I can hear you very well.

TOMSLIN SAMME-NLAR: So the question I was asking, was whether the EPDP team discussed last week about the clarity that the Council was seeking surrounding whether there is direct impact to the next round of the subsequent procedure. Do you know? I think we lost you again. All right. Well, we'll proceed then. I think Manju, go with what you suggest, not to have a strong opinion about it. And I think I'm also happy for that clarity to be brought back. Yeah, and that's correct, Rafik. So it will have to be taken out of the consent agenda. And I'm expecting Paul will request for it to be taken out so that Donna, the EPDP chair can come back and explain whether there's impacts or not, because he's clearly stated that he is unable to vote if there is no clarity about that.

So that's it about the consent agenda items. There are some items that we will be voting on specifically. One of them is the WHOIS disclosure system. And I would assume that many people understand what this is about, but if you don't, this is really about the SSAD EPDP. That EPDP had some recommendations about a system for access and disclosure of registrant data. So basically, some sort of WHOIS disclosure system which was limited only for those who actually have a reason for having access to the data.

And there has been some discussions—there was an ODP on that, an operational design phase document that the Board had requested Org to do or to do some further research about. And that report was presented to the board. The Council took a look at it, had a small team put together to take a look at it, whether it would help determine—or I think the system design, sorry, that this ODP document had put together, the Council set up a small team to determine whether it met the requirements or it aligned with the recommendations of the EPDP group.

And they decided that there wasn't enough information, especially financial information and there was a proposal to have a proof of concept of this system. And that is where this WHOIS disclosure system comes about. However, the design document that was also published during ICANN 75 regarding this system, this proof-of-concept system was being discussed by this small team in the Council to determine whether it will help them as they expect to be able to make a formal decision whether when the Council meets with the Board, they can actually have a good conversation whether the system is too expensive or not and whether it makes any cost/benefit sense.

I think the small team has now decided that it's actually proposing or requesting the Council to say yes to this proof of concept. They've given a couple of additional requests that they would like the system to do, like the ability to log requests, because the system was meant to be on a voluntary basis for registrars. So they're requesting that it logs even some data, not all the data, but some data regarding requests even to registrars that are not participating in this proof of concept.

So this vote is to send a letter to the board saying the Council is happy for this system to be implemented. So I don't really have an opinion personally about this one. I know that our members who were in this team—Manju, remind me if you are in the team or not. But our members in this team in previous meetings had said we have no concerns specifically supporting this to go on.

Stephanie mentioned that she didn't think it will actually provide any benefit, but she didn't have a strong opinion against. So that's where we sit with this one. I don't know if members in NCSG have any specific opinion about this. If there are members who have been following and have any specific opinion about this, which you think we might, we should consider going into the voting of this. And I'll pause there to see if anyone would like to say anything about this one or questions about it as well. All right. I see no hands. So I guess we'll go with the flow with this one like Manju mentioned.

Okay. The next one, if you could please go to the next screen, is the registration data accuracy scoping team. This is another very interesting one, because this team was put together to discuss what needed to be done for data accuracy. But we heard in the Council that the team had some issues, including participation.

But the team sort of provided the Council with three recommendations, which we've discussed previously. I think the first recommendation by the team was to do a survey on registrars about data accuracy. And the second recommendation was the possibility of doing an audit on how registrars [do] the registration data accuracy within their businesses.

But what is interesting is a third recommendation, which was to pause everything and wait. And the reason for this was that ICANN had approached the European Data Protection Board to understand, I think, if I'm not mistaken, wanted to know about some contractual requirements on registration data. But I think Manju was a member to this one, so Manju can help us better with this, what the team had reached out to the European Data Protection Board.

In summary, there hasn't been any response. This third recommendation is to wait for that response before anything else can be done. But I'll pass on to Manju to see if she can give us some additional information about this.

MANJU CHEN:

Yes, thank you, Tomslin. I just put in the chat that I read Greg's motion, like his write up for the motion. I was supporting it, because from a team member's perspective, we don't really think that—so for the first recommendation that we're recommending, to have this survey—and it's going to be a voluntary survey for the registrars, just to ask them how they usually practice data accuracy kind of contract requirements. And it's questionable how it's going to be useful because it's voluntary. So we don't know how many people are willing to participate. And we don't even have the questions yet. I think we were planning to—if the Council says yes to the survey, then we will start writing up the questions.

And the second, I think, is something about like Council and the scoping team to work with ICANN Org to kind of explore the possibilities to have

this audits, in the future to just check how the contracted parties are fulfilling their contractual obligations of accuracy requirements. And that's just—it's kind of vague, because it's like, "Oh, you should explore." So it's not anything substantial.

The third recommendation is like you explain, just pause it. And it's actually not something—we're not sending questions to the EDPB. It's the ICANN Org. They are like sending questions to the European Data Protection Board, asking things like, does ICANN have the right or have the obligations to touch data when it involves personal data, and what's ICANN's role and those kinds of questions.

From what I remember, when the staff were explaining to us, they were like this is a two-step process, they will be first sending a letter asking, "Can we ask you these kinds of questions? Are you willing to counsel us on these questions?" And then if the answer is yes, then they send the questions.

So when they were explaining to us, it was like they just sent a letter, they didn't even receive the answer, yes or no yet. And I'm sorry, I didn't remember anything afterwards. I don't know if they say yes or no. But seeing from no updates from the staff, I assume they haven't received any feedback.

So yeah, that's why I think it's good that we pause. Because without this kind of definite answer of whether ICANN can process personal data, we can't really provide any good recommendations of how to proceed with checking the accuracy of registration data. And to be honest, the whole

scoping thing wasn't really any kind of—I don't know, they were not very effective anyway.

So I thought it will be nice to just take a break and everybody—NIS2 coming up and all these things, maybe people will have a different perspective when we have some response back from the EDPB, maybe they will be more willing to give a response, or maybe people come in with a different reference, with more substantial legal kind of reference, which would probably benefit the discussion. So yeah, that's what I suggest, we just vote yes to the motion. Thank you.

TOMSLIN SAMME-NLAR:

Thanks, Manju. We don't have that much free time in our hands anyway to be chasing after things that don't lead in any way. So it makes sense to park it until we have concrete information to go after. So that's what that voting is about. That's what the motion is, that we should park it.

So we are not going to vote on recommendations one and two but rather vote on recommendation three to park it. That's what the motion proposes. I think Emmanuel mentioned he's back and wanted to give information. Oh, no. I think that we'll come back to that on AOB on IDNs. Let's just proceed.

All right. The last one is one which I feel like NCSG is not really sure how to—what the position is on this. However, we all know, I think we've discussed this DNS abuse small team report a couple of times, including in ICANN 75 or 76, can't tell anymore, but there were four recommendations, one of which was to put together a small targeted EPDP.

The good news is when we discussed this, we agreed with a small team under Council that we should take the question back to the community to provide feedback whether there is any need, whether the community actually supports this recommendation that is coming from this small team.

So we are not voting on whether we should have an EPDP or whether we should request for an initial—what is it called again? I forget. But to initiate the PDP, that's not what we're voting for. We're voting for recommendations two, three and four which I'll quickly tell you what they are.

Recommendation two was regarding bulk registrations, and the small team wanted to understand from registrar stakeholders—to understand more, basically, so they asked the Council to request for further information from registrars about how bulk registrations might contribute to DNS abuse.

Recommendation number three is to encourage contracted parties to continue having conversations and reach out to DNS abuse reporters to make sure that the process of reporting DNS abuse is effective. And recommendation four was asking contracted parties to have a conversation with ICANN Compliance whether there are any gaps in the contract that can be addressed.

Now, you will notice in the AOB, I have an item called the Contracted Parties House DNS abuse mitigation contractual negotiations letter to Org. That is because the Contracted Parties House has actually gone ahead, which is based on recommendation number four of the small

team report, to request that Org—to start having a conversation with Org regarding the contract, whether they could make it some sort of standard or baseline enforcement to have registrars which would normally not address DNS reports, to address it, at least with a basic standard from a contractual perspective.

So that's what that letter is about. And now going back to the vote, we are voting to adopt those bottom three recommendations, but not the recommendation to start up an EPDP. So the intention is to commit that after having further information from recommendations two, three and four, the Council will consider whether they want to request for an EPDP to be stood up, essentially. So that's what we're voting on on item six. I'll pause there to see if there any questions before we discuss the related item, which is the letter that the Contracted Parties House sent to Org. Just checking if there are any hands raised or someone want to say anything regarding that.

Like I said, we don't as NCSG have a formal position that we have completed yet. However, there is general—not a consensus but the temperature in the room is that we don't want any PDP on DNS abuse. So if anyone has something to contribute to what I've said, happy to hear it. If not, we'll get to that letter which Farzaneh shared on the mailing list. I added it in the AOB just to see if folks have read it and have any comments because Farzaneh did obviously ask what members think and there's been no response back. So I thought I'd take this opportunity today when we meet to see if anyone has read it and has any comments to provide. So again, I'm happy to hear any comments about the DNS abuse topic. Manju, go ahead.

MANJU CHEN:

Thanks, Tomslin. I read the letter. And I think my initial reaction is like Farzaneh's reaction. Maybe it's good, but then maybe it's bad in some ways that we haven't thought of yet. So it's good that it's not going to be a PDP in this way. So they will be negotiating taking the contract with the ICANN Org themselves, but then it's not good in the way that then we don't get to participate, because the whole negotiation process is like their own thing. It's very typical Contracted Parties House tactics. Just want to keep us out of their picket fence. So I don't see a strong reason to oppose the CPH approach. But then I think we really have to talk amongst us more to just try to find out if there's any real concerns that we have to raise in this kind of situation. That's my initial reaction. Thanks.

TOMSLIN SAMME-NLAR:

Thanks, Manju. I guess that is correct. That is the general feeling. I guess the question is whether there is a significant concern, or rather, what can be included in that contract? Because that's still a bit vague. That will be of significant concern to us as well. I do know they put some sort of guardrails in the letter indicating things that will not be part of the conversation. And they did clearly mention that things like content is not part of that. And it's strictly as defined by the small team, which is malicious registered domains only. That's what they also intend to look at from a contractual perspective. But like you said, we certainly need to keep an eye on it. I see Ephraim's hand up. Go ahead.

EPHRAIM KENYANITO: Thanks so much, Tomslin. So the question is, when the contracts come up for conversation, like the language, would there be a chance to have a public comment? It would be very good if we make sure that the amendments, similar to some of the contracts or some of the public comments that have been live or are live regarding, for example, change of some of the contracts, some of the procedures, if we can have that clearly and we can be able to comment and follow the process and ensure that it is public comment at that level. That will be very welcome. I think that's just the thing that we need to ensure, that we highlight and we emphasize that that should be the case. Thank you.

TOMSLIN SAMME-NLAR: Thanks. I'll take note of that. That's helpful. All right. Any other comments? Okay, if none other, the other AOB I have is regarding the public comments. And I just wanted to provide some progress. We had five public comments which were all ending in November. I think in fact, almost all of them got extended as well.

The NPOC charter amendments is one of them as well. Unfortunately, the volunteer for that was Stephanie, but Stephanie has mentioned that she's unable to provide the comments for that. So we will not be submitting comments for that, because I think it closes on the 14th if I'm not mistaken. And that's today. Is it still today? Yes, it still is today.

So just wanted to point out that we will not be submitting comments as NCSG because that comment didn't come through. Same for the pilot holistic review draft terms of reference. The volunteers also were unable to provide the comment for that proceeding.

For the proposed updates to the GNSO operating procedures, we do have a comment which was submitted by Manju on the mailing list for review. I don't know if you all saw that. And I think the deadline has been extended to the 17th of November now.

So initially, it was meant to end today as well, but it's been pushed to the 17th. So if you would like to have a last look on it, then happy to wait before I submit it, but it's ready to go. So we will be submitting that one.

The other one which we're also waiting for and I've been chasing is the registration data consensus policy for gTLDs. I'm still waiting for that draft to be made available or shared with the general mailing list so that folks can comment and [inaudible] will be able to review it before I submit. Juan, if you're listening, I'm waiting still.

And we had no volunteer for the draft IANA and PTI FY 24 operating plan and budget. So I guess that ends on the 17th. So we don't have a volunteer for that one so we will not be submitting a comment for that. I guess it's too short. The time is too short to have someone get it in time for the committee to review.

So those are the updates I had for the public comments. So Juan, it's your team's comment that is remaining. If you can have that for us so that members can review that, we'll appreciate it very much. That's all I had for AOB. If anyone has anything else to bring up, now is the time. and I know Julf is here, the NCSG chair. If you have any admin items to discuss, here is your chance.

JULF HELSINGIUS: Thanks, but I don't have anything prepared, so nothing for me. Thanks.

TOMSLIN SAMME-NLAR: Thanks. If you don't mind, I'll mention something that I have heard and I think Andrea and Brenda have mentioned it in other forums about the possibility of beginning to plan to meet other groups in the next—in Cancun. I was thinking that there's been talk in the past about us meeting with GAC again. So maybe we should start discussing that as well, whether there are things that we need to discuss with GAC.

And now that we talk about the DNS abuse letter from the Contracted Parties House to org, I think that's also something we might want to discuss with the Contracted Parties House or with the Registrar Stakeholder Group. And so I think that's another group we might want to think about meeting with. But I just thought I'll put those out and see what—and folks can go have a think about it, see if it makes sense. And we can plan that. Thanks. Julf, your hand is up.

JULF HELSINGIUS: Thanks. That's a good discussion about who we want to meet. And it has been suggested that ALAC might also be a good subgroup to discuss with. We can't do all of them. But we have to look at some of what our priorities are.

TOMSLIN SAMME-NLAR: Yes. I was thinking GAC because of closed generics. Forgive me, but I'm just thinking about policy. So being a bit selfish.

JULF HELSINGIUS: Fair enough.

TOMSLIN SAMME-NLAR: But yeah. ALAC is I guess the other—I believe, talking about closed generics, in the past, we somewhat had a similar alignment with them. So it might be good to meet them and understand what they're thinking about as well.

Raymond, no, not for any specific reason. But Emmanuel, the question I had, if you were listening about IDNs, was whether the EPDP team discussed the clarity issue that the Councilors were asking about regarding whether this change will impact SubPro. I think that's the question I had. I don't know if it was discussed last week.

EMMANUEL VITUS: No, it was not discussed last week. But I think the SubPro was one of the reasons that the team raised by requesting the change in the project plan. So before I lost my network, I was about to give some of the reasons to the team, and why, particularly, for example, I supported it. I think Farrell also supported it. [inaudible] because part of those who requested for it. So I wanted to give a brief, how do you call it, background about those reasons that pushed the team to request for the 31-month extension to the initial project plan. I don't know [where I reached before.] I noticed that I was off.

TOMSLIN SAMME-NLAR: We didn't hear any of the reasons, so you can ...

EMMANUEL VITUS: Interesting. So initially, the IDN team requested those substantive changes to the project to complete it in two phases. So the idea was to do a phase one, to cover charter questions or recommendations related to top-level IDN gTLD definitions and variant management, and in the phase two, cover the charter questions and recommendations that are related to the second-level IDN variant management.

So they are requesting for 31 month, so extension to the original project plan, with projection to some key milestones, for example, publishing the phase one initial reports in April 2023 as you mentioned earlier, and submit the phase one final report to the GNSO Council by November 2023. And now start the phase two and publish its initial report in April 2025 and submit the final report in November 2025. So that's making it the 31.

So the key reasons that they actually raised, there were seven main reasons that they raised. The first one was that there's no known dependence between the top level and the second level in the charter questions.

So when I was talking earlier, I was talking about giving priority to one, finish it and start the other one. So the idea was that in the current charter questions that we have, we have 47 charter question, if I'm not mistaken. And 28 out of those are related to top-level domains and 19 are related to second-levels.

So the idea, as I said, was to separate both. And the second reason was that they want to actually facilitate the SubPro implementation planning. And I think that was your question. So the team's recommendation on the top level has a direct impact on the new gTLD programs, and are closely linked to the implementation of the new gTLDs, the SubPro PDP output. So it has not removed interaction of the second level by the EPDP team with the SubPro implementation. So we did not discuss it last week at all. But I think in future meetings, we will discuss it.

And the third reason why they were requesting for 31 months was breaking the workload into manageable chunks so that it can be easy for the team to handle, because it can involve a lot of reading and complexity.

So they believe that breaking the work into two phases can make it have the recommendation pertaining to the 47 questions more digestible.

So the ICANN community and the ICANN Board would need to focus on considering a subset recommendation each time so that is not things that we are pushing and pushing, [inaudible] our recommendations to them. So it will be easy for them to digest.

The other reason that they also raised, which is the fourth reason, is the diversity and complexity of the IDN issues. So for those who are a bit familiar with it, the topics are very complex. So in the original project plan, for example, that was submitted to the GNSO Council in 2021, it was not foreseen by the EPDP team that extensive preparation and the study variant of string similarity review will require, for example, 13

weeks. I think we deliberated on that very recently, and it took 13 weeks. But in the initial project plan, for example, that was not the timeline given to it. But due to the complexity of the issue and the various opinions that each group has, it made it longer and difficult.

The fifth reason that they raised was the additional data collection. So the team deliberation on charter question related to second-level IDN invariant management depend on the collection and analysis of additional data, which may be provided by registries, registrars, and possibly the registry service providers.

And the team is in the process of exploring appropriate venues and approach to collect the data, including consultation with the contracted parties, etc. So additional time will be definitely required for that data collection effort. So that was one of the strong reasons that they put in their request.

The sixth reason is the ICANN Org input to the draft recommendation. So similar to the other PDPs, ICANN Org provide input, particularly from an implementation perspective, to the draft recommendation developed by the IDN EPDP team before the publication of the initial reports. So additional time is needed to be budgeted to ensure that the EPDP team is able to front load a review to ICANN Org and probably the draft recommendation for public comment that already takes the operational consideration into accounts.

And the last reason that they actually put in their request that was discussed was the public comments review and final report [completion]. So the team is saying that they plan to actually complete

this way into two phases, as I said earlier, and by doing this effort, the finalization of the recommendation from both phases, the phase one and phase two of final reports will also require some time. So additional topic may arise as a result of the public comment. And it's expected that the EPDP team has to conduct the two phases of work sequentially. Like we are doing right now parallel, if we do it separately, it becomes more easier for both the team and also easy to digest the public comments and take consideration on them.

So basically, those are the seven reasons that were raised. I actually strongly support it, because the rationale behind it, and being part of the team and looking at how the workload looks like and how the discussions are going, requesting the 31 months, I didn't oppose it because the rationale and all the reasons that were raised were very valid from my perspective, and the other team member who is also part of—the GNSO liaison, which is Farrell, we both it supported it. So that was the explanation I was giving before I actually went off.

TOMSLIN SAMME-NLAR: Thanks, Emmanuel. So if I understand very well, in summary, there's no impact to the new gTLD program with this change.

EMMANUEL VITUS: Not really. No, not at all. We stick to the initial charter questions and recommendations but will not—we're just requesting for time to digest them, but not for new gTLDs.

TOMSLIN SAMME-NLAR: Not for the top-level.

EMMANUEL VITUS: Yeah.

TOMSLIN SAMME-NLAR: All right. Thanks for that explanation. That was helpful. All right. I don't know if anyone has any questions for Emmanuel. See no hands. Okay. That's all I had for today. And I guess I'll probably give you back 30 minutes, or 24 minutes of your lives back. Thanks for coming on. And hopefully, we'll see you at the Council meeting on Thursday. Thanks. Bye, everyone.

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