

ICANN

**Moderator: Maryam Bakoshi
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8:00 am CT**

Lance: The recordings are started.

Maryam Bakoshi: Thank you very much. (Niels), over to you.

Niels Ten Oever: Thank you very much, staff, for facilitating us with Adobe Connect (and with) the recording and transcription. It's very much valued. I would also like to welcome all the members of the cross community working party of ICANN's corporate and social responsibility to respect human rights to this - to the update call so close to the Marrakesh meeting.

We have a lot to discuss. We have no less than eleven points on the list but because it's relatively close to the last update from the subgroup, I hope we can keep those relatively short, so as that, within our tradition, we will try to keep this meeting - check me at one hour.

I will do my best. So we are already an agenda point one. Does anyone have any suggestions or points for amendments to the agenda? No? I see no hands, no suggestions, nothing in the chat.

That's great, so will continue to the update on the cross community working group on accountability where quite some progress has been made and I'll ask (Tatiana) to give us a short overview of where we're there right now. (Tatiana), will you come in?

Tatiana Tropina: Yes. Well, I hope everyone can hear me. Thank you, (Niels). Hi everyone I think we have already (happily announced) on the list that ICANN board agreed to include human rights (test), wording into the bylaws (unintelligible) human rights.

They did come with a bit different wording compared to the last draft we submitted for the CCWG accountability. But although we decided that we can live with this because it looks like compromise and, of course, we cannot insist and risk to have no human rights bylaw.

So I will try to read - I know that maybe it's not good, like, for comprehension but I will try to read it. So the finals text related to human rights is within its core values, ICANN will commit to respect internationally recognized human rights as required by applicable law.

This provision does not create any additional obligation for ICANN to respond to our consider any (complaint), request or demand seeking the enforcement of human rights by ICANN (and of the court).

(So we) also agreed that these bylaw provisions will not (go into force) until the framework of implementation is developed and adopted. And the point is now how the work stream two will go because I hope that this working party, they will agree with me.

And they talked about this with (Niels) and some other people at CCWG accountability that it shouldn't be a separate working group for the human rights.

It shall be built into the (wider) community working group on the work stream two to get more (legitimization), not to get much analyzed and to get more people involved and to work closely with the community and across community.

So basically that (date) - and I'm very happy that we made it. Congratulations to all and thanks to all who was working on these who supported us. We're really overwhelmed with all the support that both before and after this language was adopted. Thanks a lot.

Niels Ten Oever: Thank you very much for this overview, (Tatiana). If you would have the text there by hand, perhaps you could also paste it in the chat so people could also have a quiet read. And I'd like to confirm that this means that - so I'd like to ask (Tatiana) for clarification. Does this mean that the intermediary bylaw is gone?

Tatiana Tropina: Yes, I think the intermediary bylaw is gone because there is no sense in this now - everything about (the interpretation) and drafting of the framework of the interpretation is already in the main bylaw text.

And actually find that it's good to understand the argument of ALAC at some other people that, if we put a deadline into the bylaws, we can easily find ourselves violating the bylaws. So yes, there is no need for (a generated) bylaw anymore or interme- yes. Thanks.

Niels Ten Oever: And does this mean that we will change this bylaw at the end of work stream two will we have developed the framework (in the) session?

Tatiana Tropina: Well, I don't know how it will be done. Because I know that in Chapter 20 of the ICANN bylaws, they have some (dormant) provisions which we will enter into force after something is implemented or adopted or whatever.

So we just have to see the procedures for these. I have basically two concepts, either this part of the provision will just cease to exist or it will be amended after the implementation of the framework of interpretation. But since I'm not aware of this process, I'm not very familiar with this, so we can ask later. But I'm sure there is a solution for this.

Niels Ten Oever: Perfect. Thank you very much, (Tatiana). And I think this will indeed mean this, this has only been confirmed that bylaw change at the end of work stream two is not unthinkable, but it's also not necessary at the moment.

So a lot of - I am back. Okay, great. I'm back. Sorry, my connection dropped. So that we will have the opport- so that now we have the situation that we have the insurance that we will work on this in work stream two, that we will work on this within the broad framework of the work stream, but at the end of work stream two, we might also come out with the change to the bylaws, although not necessarily.

So that's some great process being made there. And now I would like to slowly segue into the next point, and that is that even though the discussion was long and hard sometimes, and sometimes also intense, we managed to have a good relationship to work with the board and other parts of the community on this.

And the board also said that they wanted to continue with a - making a human rights statement themselves, to continue this work because the board has a strong commitment to human rights, which I think we should applaud and work with the board on that.

So the board has also asked advice on human rights statement. Now, (Motoco) and (Lucy) have been so kind to share examples of human rights statement of other companies but those are really quite elaborate.

But the ICANN board so that we should come up with - that they want to come up with a maximum 50 page statement, so was quickly drafting some ideas for that, what we could suggest to the board.

And I put the discussion for that. Fifty words, sorry. Not 50 pages, 50 words. So it's a very short statement which shows intention of the board. And I'd be happy to work with you on such a recommendation.

I put out a first carving of (such a statement) in the (path) I just pasted there. I can also put it back here. I'm very happy to brainstorm this with you about it, what you think should be in there and what should not be in there.

So I'm happy to (edit) with you on the (path) or discuss this on the call. Would like to take a first stab at it? Let me first read it to you. "The ICANN board commits to respecting human rights within ICANN's core values and narrow scope and mission and will work together with the community to identify where ICANN's policies and operations can impact human rights and will seek to ensure that no human rights are violated.

"Furthermore, within its mission, ICANN will review its process for remediation to ensure that processes are in place to redress if need be." This is,

of course, still not a very lawyer-y text but do people have an idea (if we've) covered the ground? (Tatiana), go ahead.

Tatiana Tropina: Thanks, (Niels). Tatiana Tropina is speaking. I'm - I mean, I'm not sure about the last sentence. I think we have to be careful when we will send it to the board and tell them that it doesn't mean that they will have to enforce and protect.

I think (the reason it's missing) is a good clause there that will restrict this sentence, but I believe that that might be a problem. Other than that I have nothing to add, only to warn the board about the last statement that we don't mean or it doesn't mean that there is protection and enforcement. Thanks..

Niels Ten Oever: Great. And are there others who have thoughts on this? I'm looking over it people who have worked more with these kinds of human rights statements. Does this text sound like agreeable or too broad?

(Motoco), please go ahead. (Motoco), you have your hand raised. Please go ahead. I do not hear you currently. If there is an audio problem, perhaps you could send your number two Maryam and she can call you in. Is the call out working out, Maryam?

Maryam Bakoshi: Hi, (Niels). Yes, we're telling up to (Motoco) now.

Niels Ten Oever: Okay.

Woman: (Unintelligible).

Niels Ten Oever: Hello?

Motoko Aizawa: Hi (Niels).

Niels Ten Oever: Hi. Great to hear you.

Motoko Aizawa: Yes, sorry about that. I could not - I could hear you but I don't think you could hear me. I don't know, so apologies.

Niels Ten Oever: No problem. We're waiting for you to slaughter our text.

Motoko Aizawa: Ah. Well, look, I think the first draft is a very good one. It is fairly consistent with the guiding principles of the (unintelligible) human rights. I think it's important to have something about remedy, and so this qualification that its within its mission that ICANN would do so to provide redress, I think that's a good idea.

But I had sort of an overarching question which is, how do we distinguish the statement from what's in the bylaw? And what do we expect in the human rights statement that would give it more flavor, a stronger flavor for implementation?

And because of the word limitation, we could end up saying something fairly similar with the bylaws which I don't think would serve its purpose. And so I thought maybe it's worthwhile just having that conversation.

Niels Ten Oever: Yes, I think that's a very good point and that's, indeed, a risk we see because I see that we're kind of repeating the discussion in the bylaws, now in the commitment text so maybe we should indeed look at it with some (fresh) language and some fresh eyes. Do you have some ideas for (stab) or text or other frames in which you could put this?

Motoko Aizawa: I think, (Niels), the thing to do is to pick up some language from the guiding principles and adapted and the ICANN context and there is a little bit more meat in the guiding principles in terms of internal processes.

So perhaps they can be done. That's one idea. It's a safe idea. We can point to the guiding principles as the source of our interpretation, but I am obviously open to other ideas.

And also, I wanted to ask the community whether, you know, are we intending to provide some interpretations of the bylaws? Are we trying to undo some of the limitations that are in the bylaws? What are our wishes?

Niels Ten Oever: I will try not to enter that but have someone else answer that question.
(Tatiana), go ahead.

Tatiana Tropina: Thanks. (Motoco), thanks for raising these points. They're extremely valid in these contexts. I don't really know what the ICANN board wants to say with the statements to be honest.

I'm not even sure that they will go anywhere further than the bylaws. My concern about (rugi) principles this that if we will add up some meat to the statement and we will somehow make it clear that these - this is coming from (ragged) principles.

I believe that it might cause a (unintelligible) in the board because there is some strong opposition to (rugi) principles that we're going to make thorough work on these in the work stream two.

And I believe that we're going to convince the community that, at least partially, (rugi) principles shall in half to be used in the policy framework, in the framework interpretation of the bylaw.

But I believe that it might be premature right now, just take (rugi) principles and show the board, yes, you have to commit like this. This is just coming from the policy context and from many fears the board had before even adopting this bylaw language.

Our concern in the language of the statements repeating the bylaws, yes, I see, especially in the first part. That's why I think that the second sentence which was added - oh, my God, now it's (loading) the text.

The second sentence about remedies might be helpful or remediation might be helpful in this sense because it's a small, small, small step but still a step so that - and maybe the board will agree (that we do).

If I'm very honest, I don't know if they will actually go and a shorter than bylaw language, taking into account their previous resistance, taking into account the position of the ICANN legal for thinking that anything like this will open the door for (claims).

So I don't know. We have to balance here. We have to balance and we have not to make, like, not to use any kind of (coercion) so we have to be smart. Yes, this is basically my answer to this question. If you ask me what to do, well, I will honestly say I don't know but I'm ready to take part in the discussion. Thanks.

Niels Ten Oever: Vidushi, go ahead.

Pranesh Prakash: Hello. I'm sorry, this is Pranesh Prakash here for the record. And I'm turning my colleague, Vidushi which is why the name is showing Vidushi. On the language itself, I have two small suggestions.

One is, where it says within ICANN's core values and narrow scope and mission, we remove the word narrow because scope and mission covers it properly. And secondly, where it says violated, while it might be better to (say and write it) adversely enacted rather than violated, so these are two small suggestions.

Niels Ten Oever: Accepted. Thanks very much for that, Pranesh. I think we should somehow - I think all your points are valid. Now, I agree with (Tatiana). So I think what a human rights statement is, and the board has explicitly referred (to) this as a practice within the (rugi) principles, so that the managed - and I think we should also see it in a process.

I don't think this is a clear commitment externally but it's a commitment of the board to say what they want to do. So it's a - I think it's a statement of intention. But I think it's a statement of good hope, will and a positive way to go into the process.

So I think that the board can show what they would like to do. So I think we can be ambitious there because it hasn't got the legal stature of the bylaw. But I think we should just move away a bit from the bylaw text so that we also do not implicate that relationship.

So we do need to be a bit creative and so - yes, I will - I'm not sure if we should continue drafting this right now but I think we can - so (Motoco) is asking in the chat, so does it mean the board may be open to a statement about ICANN towards implementing the bylaws?

Yes, yes, so I think that the board would completely want to do that but I think it will not say how that should be done because that isn't part of the community but it's good to say what its own aspirations are to do so, at least that is what it aims to do. Pranesh, Vidushi, go ahead. Okay, it was an old hand.

I would like to send our text soon. Are there some people that would volunteer for a short rating session later today if we cook something up and share it to the list?

Great. So (Motoco) and (Tatiana). Great. So I propose that we jump on a Skype channel are on the (pad) after this call and we see what we can do. That's great.

So is the fourth point, I - everyone is okay with closing this point, taking this in a small committee work in drafting this, bring it back to the list. And if we do not hear back between 24 hours, then we'll send it to the board as a suggestion.

And we cannot continue to point four for the discussion about content of the meetings in Marrakesh. And we have now four - three sessions outlined. It is a public session of the cross community working party, a working session of the cross community working party and a joint session with the GAC working group on human rights and international law.

So I would like to ask for proposals and ideas for an agenda for this meeting. Things that I have thought about are presentations by the subgroups of their work as we've been doing in the call, as well as, will we agreed, a

presentation of 10 to 15 minutes about intermediary liability and about the Manila principles and how that can impact human rights.

And then probably an overview of where we are in the cross community working group and within the working group to ensure that all efforts within ICANN are converging or at least informed by each other.

What are other things that you think should be in the public session? Are we missing something? Are we doing too much? So I'm not getting much feedback on this. So I guess this is okay.

About the working session - in the other - the public session is bit over an hour. I think we got one hour and 15 minutes. So this will already be pretty packed. A discussion about potential dangers ahead. That's very good. That can be part of a Workstream 2 discussion. Oh, 75 minutes. Thank you Nigel. Yes. So it's one hour and 15 minutes.

(It's) very good. So with all these suggestions, I will try to come up with a suggested agenda and we'll share it with the list this week. Are you all satisfied with the structure of the working session as we've done it thus far?

So very informal but to discuss what we've done in the subgroup (say where) we can go forward or would you like a more formal structure? Within the working session I would like to also evaluate a bit whether the structure of the subgroup is effective. Would you all be okay with that? I see that there are a - yes. I see that people are saying that the long session on intermediary liability would be good. I completely agree.

Let's see how much discussion and traction there is at this ICANN and then see whether we can discuss it in a different forum for the - perhaps for the

next meeting and whether we should discuss it particularly in meeting with the registries, registrars where you want to do a separate session about it next time.

Just see what is the best way to bring this topic about. So I would also see how it goes in the public session and then evaluate in the working session. And a less formal session for the working session, that sounds good.

And for the GAC Working Group on Human Rights and International Law I think we will need to make bit of a formal presentation of what we've been doing (of) the subgroups and then see how we can - how we can present our work in the GAC Working Group.

I really hope that the GAC Working Group will have their terms of reference done by Marrakech so they can also start their work so we can really start doing work together as - so if there are any - if there are no more suggestions to that, should we work as a short (synthesis)? Yes. Yes. Yes (Hidochi). That's a very good point.

So I think with the - in Marrakech now less than a month ahead I will ask the subgroup to come up with a short summary of their work and to come up with a one or two slide presentation of what they've done. And then we can run through that work at the meeting of the GAC Working Group.

I would like to get as much voices as possible heard there; me not representing the work of the subgroups so that we really have a broad - so that we can really show the broad spectrum of people working in the Cross Community Working Party and also the different ways to engage with us.

So I will propose all that in a meeting mail that I will send out this week plus agendas. And now we'll go a short update of the subgroup. Is there someone here who is active in Subgroup 1? There is no one here from Subgroup 1?

The people from Subgroup 1 are - Marilia is leading it. Stefania is in there as well. But I think we'll wait for an update from Marilia. Then (Parnesh), where are you in Subgroup 2 or Vidushi for that matter?

Vidushi Marda: Hi. Please can you hear me?

Niels Ten Oever: I hear you very well. Much better than last call.

Vidushi Marda: This is Vidushi for the record. So we had two calls in Subgroup 2 so far. The first one we've decided what each of us would be working on. And we decided to look at (unintelligible) topics and decide that we (unintelligible) and ICANN policies.

(Unintelligible) Working Group and (unintelligible) issue report for the PDP (because) we are (at the end). So each of us agreed to be coming up with (unintelligible) each other.

As of now we have (unintelligible) (for one so far). We're waiting to have a call sometime this week or the next depending on the (unintelligible) and we'll see how we take it from there.

Niels Ten Oever: That's great Vidushi. I'm missing a terms of reference for your subgroup on that page. But I think your team has discussed one, no?

Vidushi Marda: What's in the terms of reference?

Niels Ten Oever: So there was a short work plan I think for the subgroup. But if you have not made it, I think by now it's a bit late to work on that so then we do in Marrakech. But if you had done it, then we could...

Vidushi Marda: No. We have done it, sure. Basically we decided to document (cases) and examples in which ICANN is (supposedly) impacting human rights. And we decided also to (not) focus on issues that the other subgroups are working on. So we haven't looked at...

Niels Ten Oever: That's...

Vidushi Marda: ...sorry.

Niels Ten Oever: That's great. So if you could put that down in one paragraph and...

Vidushi Marda: Okay.

Niels Ten Oever: ...email that to Maryam so then it can be as a terms of reference and that is so everyone is clear what groups (who is) working on.

Vidushi Marda: Oh, okay. Okay. I'll do it.

Niels Ten Oever: Thanks. Thanks so much. And then from you I'll ask soon as well to have a one or two slide presentation for Marrakech but it sounds like you will be more than able to do so.

Vidushi Marda: Yes. We should be able to do that...

((Crosstalk))

Pranesh Prakash: Just - this is Pranesh Prakash for the record. Just a request to everyone else on (something that's going to speak) to send in updates on the mailing list as Vidushi and I had requested last week. And we really need a (unintelligible).

Niels Ten Oever: Great. So indeed rally the forces Pranesh. Good work. So then we continue to Subgroup 3 where quite an interesting work has been done mostly by Motoko. So I'll ask Motoko to present that. Would you be okay with that Motoko?

Motoko Aizawa: Yes. Thank you. This is Motoko for the record. Can you hear me okay?

Niels Ten Oever: Very much so.

Motoko Aizawa: Okay. Excellent. So we have begun a process of thinking through different steps that are required for us to carry out a human rights impact assessment of ICANN operations. And as many of you know, this is a - quite a elaborate undertaking. And so we're taking a stab at it incrementally.

And what I circulated -- I mistakenly circulated to the wrong group - I may have but I hope everybody has it -- is a sort of a interrogatory. It's a request for ICANN to produce various documents that would be reviewed for us to understand very comprehensively ICANN's human rights impacts arising from its operations.

And it's a fairly detailed set of documents that we are requesting. And now some of them are - some of the information that's been requested is already in the public domain.

So we can actually collectively put together what we know and where we have a gap, we can ask, for example, ICANN management or ICANN Board to supplement.

And this way we can have an engagement with ICANN; this actually stimulate their discussion, their internal reflection as to potential issues and also for us to have a very complete idea of ICANN's human rights impacts or potential for a human rights impact as opposed to only focused on one aspect and not being aware of others.

And so it's a way for us to engage ICANN management and Board. And it's a first draft. So I would very much welcome any input on what might be missing, what might be excessive with the understanding that we're being very thorough.

So I can see - I can already imagine ICANN's Board may have a hard time digesting some of the stuff and may have questions about why is this relevant. It's relevant because this is way human rights impact assessments are being carried out.

And in fact I took some clues from the Danish Institute's Human Rights Toolkit, which just came. Those of you who are interested I can send a link. So it's not like, you know, I just dreamt this up but this is actually adapted from a popular and well-used toolkit that is appropriate in the private sector business enterprise area. Let me stop there. Thank you.

Niels Ten Oever: Thank you very much Motoko. That was a really great overview of the work and (assessment of) where that goes. I see that people are asking for a link. I will now forward it from the Subgroup 3 list to the general list so that everyone can have a look at it. (Unintelligible) in the call questionnaire. (Okay). So people can have a look at it and come with input to us and Subgroup 3 and then see how we can populate this.

I would also be very interested whether Nigel would have - oh, Nigel has his hand up. So you're faster than me Nigel, which is mostly the case. So Nigel, please go ahead.

Nigel Hickson: Good afternoon. Nigel Hickson. Can you hear me? I (may not quite show) on the computer. But I just really wanted to sort of cite this important work I suppose and to ask whether this - well first of all to also tell you that this work is separate as I understand it from the work on the Cross Community Working Group on Accountability. This is a separate piece of work that the working party is doing.

And secondly that it might be opportune for us as staff so to speak to dedicate a person that you work through for these questions and discussion points that that's something that I can discuss with colleagues and come back with. I just want to flag that. Thank you.

Niels Ten Oever: Oh Nigel, you're - that's great. That's definitely something that would be very useful for us to communicate this with - discuss this with and to see what would be possible to work on the questionnaire and get the right information on the right place so that we can also feed in the discussion to the Cross Community Working Group in Workstream 2.

But we think that this human rights impact assessment is crucial for all discussions on human rights because it will make far more clear what we are concretely talking about.

And right now we're still basing ourselves on (anec) data so it's like anecdotal information and guesses where ICANN impacts human rights and this will help us make a far more comprehensive analysis, which I think will further the discussion in all parts of the community and raise enough awareness as well.

It would be great if we could work with you on that. Thanks so much for the offer. We'll - let's be in contact about that.

If there are no more questions or suggestions based on the update of Motoko, I would like to suggest we continue to Subgroup 4. And Subgroup 4 is under the lead of Marilia but also Pranesh and Aarti are in there. Can I have the next or Aarti could give us a short update on whether something has been happening on the providing input to PDP or new gTLDs from a human rights perspective.

So (Ganyes) writes I was on the last call. We discussed potential areas of concern to working group charter. And Marilia shared the call for volunteers on the mailing list. If I'm not wrong, a list of potential areas for human rights concerns within the new gTLD program is being compiled and will be shared so that individuals can volunteer to work on specific parts. But Marilia will be in a better position to give a clear update.

Well, (Ganyes), I think this update was very clear and very good. So thank you very much for that. Nigel, is that an old hand or a new hand? That was an old hand.

So then I continue to Subgroup 5 that is under the inspiring lead of Stefania. Stefania, go ahead.

Stefania Milan: Okay. Thank you. I have a microphone (unintelligible). So Subgroup 5 just started working. We have - I think we just put on the Web site a terms of reference. What we have in mind is to follow the (unintelligible) PDP, which, as you know, has just started.

So we have also just started just being a bit of a (unintelligible) tried to start but (unintelligible) very well in - with the (unintelligible) of the PDP. So far the PDP has had two calls. We are still in the process of deciding (unintelligible) leadership of the working group.

And so what concerns our subgroup that we are (unintelligible) Subgroup 4 trying to decide what are the concerns - human rights concerns for the (unintelligible). We should have a call sometime next week if we find a time that puts together everyone's - (every) parts of the world. So we just really at the beginning but at least we have started.

I don't know. Many of those people (unintelligible). Other members also follow the work of the PDP as such. But it's not (unintelligible) rely (on the other) information.

For our first call I was trying to invite also (Stephan) (unintelligible) today. So that all the - whatever came before the current PDP for bringing everyone up to date (unintelligible). And then we're going to move on to - as we define the list of human rights concerns. After all that (then we sure) it's going to be also (unintelligible) if you want to join. Thank you.

Niels Ten Oever: Thank you very much for this update - for this update Stefania. And if there are no questions -- I see no hands and no discussion in the chat -- that brings us to the end of the overview of the subgroups.

That brings us to Point 10, update on operational issues. Well, we've discussed that all the sessions are approved that we will have. We've done the updates so I don't have any further operational issues.

That leads us to any other business. Does anyone have any other things to bring up or to discuss; a new human rights issues at ICANN or things we should look at; eventually should not miss; anything?

Stefania Milan: Thank you. Stefania Milan for the record. I was wondering whether we are planning or thinking (unintelligible) to contact or get in touch in a way or another with (unintelligible) or whether we are planning. Sorry if I asked something that perhaps we have already discussed somewhere else. I'm a little bit behind reading mail.

Niels Ten Oever: That might indeed be a good idea. I have not through about it for a second. I am certainly not against such a thing. Do people have any idea what should - what we should (put in there)?

So we could send a - we could send an invite to discuss; perhaps underlying the history of Sweden and human rights and just send them a welcoming note and a welcome to discussion. Perhaps a short overview of the human rights work as it has been going on and that we're also very eager and happy to update him on the work.

Is something like that something that would work - that would seem useful? Stefania's computer is frozen but she's nodding yes to me. And Nigel says just worth noting that he does not start until May. So we have some time to draft the letter. But people are already sending letters so it might be good to already work on that.

Okay. So that's a good thing. Stefania, would you write - would you write a draft?

Stefania Milan: (Unintelligible).

Niels Ten Oever: Okay. Very good. Stefania is going to write the draft. Before the end of the week?

Stefania Milan: (Okay).

Niels Ten Oever: Great. That's nice. That's a nice thing - concrete to do. Any other business? Any other points? I really like this one. So if not, then we're quickly reaching the end of the call.

But I would not like to end without telling you when the next call is going to take place. The next call is February 26 at 1600 UTC. And I'm very much looking forward to talk to you all then. Let's ensure that before that we have some updates on the list. So quickly we can also agree on something that we will present in Marrakech so that we can prepare the material and show concretely and structurally what we have been doing.

So I would like to thank you all very much for this time on this gray and rainy Wednesday here in Amsterdam. Am looking forward to talk to you again by the end of the month and to work on - and to work with you in the meantime on the list.

Thank you very much. And if you have any questions or requests for support, always feel free to reach out to me.

END