
FABIEN BETREMIEUX: Can you confirm that the recording has started?

UNIDENTIFIED FEMALE: It's started.

FABIEN BETREMIEUX: Okay, excellent, thank you. Good morning, good afternoon, and good evening everyone. Welcome to our meeting of the Security Framework Drafting Team on Wednesday, the 16th of December 2015. My name is Fabien Betremieux. I'm the Senior Registry Services and Engagement Manager with the Global Domains division of ICANN.

A few reminders before we jump into our agenda and discussion today. Please mute your line if you are not speaking. This meeting is recording and will be transcribed. For the purposes of the transcript, please don't forget to state your name when you speak.

Finally, if at any time you would like to get into the queue, please raise your hand in the Adobe Connect room.

The purpose of our call today is to present and discuss the draft framework that the registries delivered and which was shared with the mailing list I believe earlier today.

Before we get into that discussion, I want to provide a very short introduction of the context. Then we'll move on to a presentation and discussion of the framework, which will be led by the registry co-chair, Yasmin who I believe has joined the call now.

Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.

And we will try to make sure that we have some time at the end of the call to discuss next steps based on the discussion and the timeline which I'm going to remind to everyone in a few seconds.

Let me very quickly move on. I just would like to remind everybody of our timeline which we have discussed during the meeting in Dublin during ICANN 54. So we are at the second half of that chart at the bottom in terms of developing the security framework. The registries have now delivered a first draft of the framework and we're entering a period where it will be a cycle of reviews and revisions of that draft.

Hopefully the target would be that we have a final draft early next year. That would be by the end of the month of January. This draft, once it's been reviewed and revised within this framework drafting team, would go for public comments. And eventually, once public comments are processed by this team, it could be released as a final document for our community to consider implementing.

So let me stop here and turn it over to Yasmin. I will also load the draft framework. I'm [seeking] Yasmin in the Adobe Connect to make you a presenter if you'd like. I don't see you logged in, so let me know how you'd like to handle that and if you'd like me to scroll the document as you present, Yasmin. Just give me one second. I'm going to load the draft framework. Okay, here it is. Yasmin, can you hear me?

YASMIN OMER:

Hi, Fabien. Yes I can.

FABIEN BETREMIEUX: The floor is yours.

YASMIN OMER: Thank you. I should be able to do it in a second.

FABIEN BETREMIEUX: Once you join, I will promote you as a presenter so that you have control of the document.

YASMIN OMER: Excellent. First of all, I just wanted to say thanks to everyone for making the call. Fabien, again, thank you for coordinating the call. I'd like – I know that in Dublin we identified a target deadline as far as the end of November to get the first draft out. We've obviously passed that deadline. The fact is we've just been getting [inaudible] from the registry perspective. We continue to get comments and those comments are still coming forward.

Also, the privacy and confidentiality section has been left to the end and we're still awaiting comments there. But we thought that what we'd do is share the document because the privacy and confidentiality section, whilst is an important section, weren't really contained the substance of the document. So we thought that we would share the comment before then to generate the discussion.

Fabien, has the document been loaded?

FABIEN BETREMIEUX: Yeah, Yasmin, it has. But it seems that you've left the Adobe Connect room. So if you'd like me to just call out [inaudible]. You're presenter. You should be able to control the document. Can you confirm?

YASMIN OMER: I'm having terrible connection issues this morning.

FABIEN BETREMIEUX: I can help you if you need.

YASMIN OMER: Okay. There we go. All right. What I'll do is provide a quick overview of the document. I won't go into significant detail here. I guess I'd like to leave that for the question and answer session. We might need quite a bit of time for that.

I guess I'd like [inaudible] the approach that we're taking and focus more on the guiding principles rather than the actual principles [that we've] put together.

We've just provided a quick background. Again, the first section, which is the introduction, it does appear to be quite long. However, given that there's so much interest in this area at the moment, it's really worth clarifying the objectives disclosed and limitations of this document.

I know some may be looking at this document and thinking that it doesn't cover everything that's abuse related. That is actually the intention. There are quite a few [inaudible] in the ICANN community

that are occurring that are focused on, for example – [inaudible] clarifying. Focused on, for example, providing guidelines on how a registry operator conducts the technical analysis.

There are other efforts in the registrar community focused on providing best practices on how registrars also respond to threats. So the document is limited in scope and that's [inaudible] intention. That's not to say that those other areas aren't important and aren't being considered by registry operators. They certainly are.

Again, we've got a few objectives in this effort. First and foremost is to meet the objective of the [NGPC], [inaudible] commitment to the GAC, [inaudible] development of this framework. Then I guess take an opportunity to educate the wider community as to the registry operator's role in the DNS framework. Then finally to [inaudible] registry operators that are new to this space.

Again, this document isn't a clarification of the existing requirements, and as such won't discuss how the technical analysis to identify a security threat is conducted. So the document assumes that a security threat is identified through any means, be it a [inaudible] party, a technical analysis or the registry operator's random sampling.

The document is not intended to create new requirements. It's certainly not a best practices document. And to that point, it's a document that describes how the registry operator may respond to security threats rather than how the registry operator should respond to security threats. I guess the point is that, first and foremost, it's the registry operator's policies that dictate what occurs in that regard.

Finally, the document [inaudible] compliance because there's no corresponding provisional, contractual obligations that relate to.

We've got a few guiding principles, and the one that I really want to focus on... Well, there are two, actually. Universal applicability and standardization not being an objective.

It's certainly been a challenge trying to put together this framework, taking into account the many different types of registry operators. You've got brands that have incorporated to [spec 13], you've got community based, you've got [inaudible], those with an exemption to the Code of Conduct. Then you've got all the different business models.

What we didn't want is to have this framework be held up by a large group of registry operators who think that this doesn't just apply to them. So it was very important that the content of the framework is universally relevant and applicable.

Now, the challenge there is that we can't go into specifics because specifics may not necessarily apply. That may appear to be, I don't know, a point of frustration for some. But it's just a challenge that we've had to deal with, and hopefully we've struck the right balance there but we do look forward to comments and input.

Again, standardization not being an objective. The point there is that how the registry operator responds is really dependent on their policies. We're not trying to encourage a one-size-fits-all and that's really cognizant of the fact that there are many different registry operators with respect... There's diversity with respect to the business models, etc., that doesn't really make that approach practical.

Then that's just a quick overview of the outreach that's previously been conducted in this space and previous efforts. Okay. Thanks, Fabien.

The point of this section and this infographic – and, [Chris], if you're on the call, please feel free to jump in – is to really provide the wider community an understanding of what the registry operator's role is in the DNS ecosystem.

I guess the interactions of the working group over the last year have indicated to us that there appears to be, in some cases, a misunderstanding with exactly what the registry operator's role is.

The point that we're trying to make here is that the registry operator's role is actually quite limited. And because of that, this focused action that the registry operator can take is [subsequently] limited. Again, this section just provides... Well, [inaudible] drive that point home.

Now, the other point I wanted to make about this particular section is that we're talking about the role of the registry operator. So where the registry operator also acts as the registrant, this infographic still applies because in that particular case, the role of the registry operator, while it's acting as the registrant, is still acting in its capacity as the registrant in one particular case and is still acting as the registry [inaudible]. I don't know if I've articulated that correctly. But I guess the point I'm trying to make is that whilst the registry operator and the registrant may be one in the same in some particular cases, the roles are still [inaudible].

Now, this infographic [inaudible] from ICANN. Again, this provides an overview of the typical contractual web that's in place in the registry/registrar/registrant model. Again, I think that emphasizes the

point I was trying to make in the last discussion on the previous infographic that even where the registry acts as a registrant, the registrant still accepts the terms and conditions that are applicable to registrant. So they're still contractually acting as a registrant.

Again, the key takeaway from this infographic is the fact that it's the registrar that has the agreement with the registrant rather than the registry operator. And whilst the terms of the registrant agreement may in some cases be dictated by the registry operator, the registry operator in most cases does not have a direct contractual relationship with the registrant.

This section three may appear to be quite long, but again the purpose here is to provide an overview as [inaudible]. So think of this as potentially a typical lifecycle [inaudible] domain name. The key takeaway here is to emphasize that this framework is only really applicable to phases three and four. So the phases regarding identifying the actions that's to be taken [inaudible] identified and tagging that action.

Finally, [inaudible] finally. We cover responses. So the approach that's been taken here is to identify a principle and then provide the accompanying rationale. So we've identified... We've taken the principles approach here rather than dictating specific actions that a registry operator can take in response [inaudible]. Again, that's based on the guiding principle regarding ensuring that this framework is universally applicable. And we thought that providing specific responses would undermine the notion of universal [applicability].

So [inaudible] principles with respect to how a registry operator responds, so just ensuring the proportionality of their responses. And all responses are [grounded] in the TLD's policy. The responses need to be timely. That ties back to one of the objectives of this framework and [inaudible] mitigating security threats. So they're all here to ensure that we all do share the objective of mitigating [the time to] [inaudible] a security threat.

And [inaudible] to clarify any of these sections and further explain, specifically in the Q&A portion.

Notification procedures as well. We provide a number of principles with respect to that. So this is really the [substance] of the proposal. So I urge you to all read through.

And appropriate consequences. This section was a challenge. I'm sure you understand why given the number of times I've mentioned the importance of ensuring that this framework is universally applicable.

As I mentioned earlier, the key takeaway from this section on the registry operator's role in the DNS ecosystem was that, in most cases, it's the registrar that has the contractual relationship with the registrant. It's the registrant that owns the commercial relationship with the registrant. It's not necessarily the registry operator.

And whilst there may be different approaches by registry operators all interacting with the registrant, in most cases, it's the registrar that has that interaction and is the most appropriate entity to own that interaction.

So what we've done here is refer to a registrar to a document that's been a best practice document that's been developed by the registrar community. That's [inaudible] approaches to abuse. I'm hoping Theo, if he is on the call, could touch on that a little further.

Again, we refer to that document such that the registry in most cases would refer the document to the registrar – sorry, report to the registrar – and the registrar would highlight what can be done.

That registrar document is a very useful document. It does go into... It provides some excellent guidelines to registrars as to how they should respond to certain security threats by type. And it's because that level of detail that was there that we referred to that document. And it really does drive the point home that it's the registrar that owns the commercial and relationship otherwise the registrant.

And finally we've got the section on privacy and confidentiality which is [inaudible] at the moment. I do apologize, but we're still awaiting input on that section.

Okay, guys, that's it from me by way of overview. I'd like to leave the remainder of the portion for the Q&A. For the other registries that were involved in the drafting of it, please feel free to jump in and answer and clarify any of the questions. Thanks, Fabien.

FABIEN BETREMIEUX:

Thank you, Yasmin. Richard, would you like to please go ahead?

RICHARD ROBERTO: Yeah. This is Richard Roberto from [inaudible] Registry. I just had a little bit of a question. I'll probably have more things to say about it, but I won't go into detail on this talk. When we were drafting this, I think used the term "abuse" throughout the document, and I think very late there were some changes to use the term "malicious behavior" and those sorts of terms instead.

It seems to me as a registry operator, I can objectively measure the result of conditions or actions as to whether or not they were abusive, but I don't know how I can objectively measure conditions or actions to be whether or not they're malicious. I'm curious if you can comment about why that change was made.

CHRIS KLEIN: This is Chris Klein. Can I speak?

FABIEN BETREMIEUX: Please go ahead, Chris.

CHRIS KLEIN: Okay. So the domain names themselves are not abusive in and of itself. It's the activity that occurs around the domain names. That's the point there.

RICHARD ROBERTO: Okay, but it's not the intent that's being measured. It's the abuse. It's the abuse. It's the result, right? How am I supposed to know if someone's malicious or if someone's foolish?

CHRIS KLEIN: That's a good question.

YASMIN OMER: How about registries take that back and consider it? We'll probably have a call I'd say early next year to further discuss the draft in parallel with the GAC's review. So that's something that we could look at during that period as well.

FABIEN BETREMIEUX: Richard, do you still have your hand raised or is that an old hand?

RICHARD ROBERTO: No, I just don't know how this thing works. Do I have to put it down myself or do you guys take it down? I'll see what I can do here. Hang on.

FABIEN BETREMIEUX: Thank you. Jeff, please?

JEFF NEUMAN: Yeah. Can you guys hear me?

FABIEN BETREMIEUX: Very well. Thanks.

JEFF NEUMAN: Cool. Yeah. I submitted comments pretty late. I apologize for that. But I think there are circumstances where section two – I think it's section two – that has the roles and responsibilities. I don't necessarily agree with the assumption that a brand TLD is just a registry acting as the registrant and therefore this still applies. I actually think there are a number of circumstances where the registry is a separate entity, even though it's an affiliate of the registrant. And this makes it seem like contractual obligations are always enforced from the registrar to the registrant where that may not be the case.

And there are some other TLDs where, if you look at the next diagram, where registries have direct agreement with the registrant, and therefore the more appropriate party may be the registry operator to take action as opposed to the registrar.

I think this diagram is right with respect to all the generics of the generic TLDs, or the keyword open TLDs. But I think we're going to need to make a distinction with at least the [brand] TLDs and perhaps the restricted TLDs whether it's like a .pharmacy or a .bank which may have different types of arrangements.

So I don't know, Yasmin, it's the best way to do that with a separate section that just addresses that, or should I intersperse it in comments?

YASMIN OMER: Why don't you have a crack at it, Jeff, and let's take it from there. I'm anticipating a bit of review from our end in parallel to this document being reviewed. Let's try and [work on] that over the next couple of weeks. But [say what you think] is best and let's discuss it further.

FABIEN BETREMIEUX: Thank you, Jeff. I see in the chat that [Nick] is writing some input on the term issue that was discussed. Would you like to please go ahead?

UNIDENTIFIED MALE: Yeah, thanks, Fabien. We've [inaudible] the document just today. First of all, thanks very much for this. [inaudible] we can really see the work that's gone into this document over the last couple of months, so thanks very much for this.

In a very quick summary, it would be great if I could maybe between now and Christmas continue some of the points by e-mail. But the highlights for me at the moment read in the document. In fact, the biggest highlight is on page seven. I think it's page seven, Fabien, because it's got you with your hands on your hips and a new ICANN logo there on the diagram. I think the registry got that right when they were identifying the roundtable in the chat as [inaudible]. Sorry, it was just a joke.

Just on a more formal basis, it seems to incorporate a lot of what was discussed positively in Dublin. It does [align] to lots of the guiding principles. Law enforcement and CSWG staff would really like prescriptives in it in terms of timeframes and fixed processes. We kind

of know that would affect the stability of the document and the response as well. We're kind of happy that there's a lot of bend and flex in this.

I think in terms of a lot of the contractual agreements that have just been discussed, I'm certainly not an expert on that, but I know the summary in the document, I was reading that the registry may be able to override a particular process and go direct to the registrant if needed in terms of non-responsive requests and issues.

Perhaps there's lots of scope there that allows a lot of flexibility and result and responding to security threat.

The [spot] process we definitely support. Consistency and forging relationships with likely applicants such as ourselves and other parties to both notify and receive a response to a threat, and as best practice for us. It's not prescriptive in terms of abuse or [inaudible] private [inaudible]. Maybe a good term is misuse of a domain. That might be one for the registries to discuss in terms of terminology. Bear with me one second.

It's quite flexible on the [feeds] as well. So that not one-size-fits-all mentality kicks in. Standardization is not an objective. You're kind of doing what you can when you can and one speed of response to a severe threat might be different from one registry to another.

So I'll [inaudible] some more. That's kind of what we were expecting in the document. I don't think we're going to formalize any of that in terms of dictation of what a response should be in a particular timeframe. It looks like if we can classify the threat and prioritize it and

there's a spec 11 commitment there, with an ability as well in the document and maybe local policies can change, maybe as the threat changes and different abuses change, industry timing [inaudible] self-regulation will supersede any [inaudible] process.

Just one more point going for me. Yeah, the referrals to law enforcement. I think, again, the same rules apply. We would welcome a referral, if needed, to help in the mitigation or outline a resolution of a threat or a response. Possibly with ICANN as well on the end of that, [list of helpers] if needed.

With the ability to say certain agencies might be able to deal with that referral better than others, which may in terms of local capability and size of agency again align to the registry response as well. The law enforcement response may be the same.

I thought overall it was an incredible effort. I'm quite happy to take this back to the group and possibly before the 24th of December to give an overview on that to keep on track in terms of maybe a more formal response and a confluence call in January.

I don't know if you've got anything more, Nick, to add to that. Again, I probably need to read the document.

Actually, there is one more thing. In terms of examples of when you may or may not respond, there's one example listed of a registrar responding to a particular threat and having the relationship with the registrant. [inaudible] appendix on the end of the document with some more registry examples of where you might intervene.

I'm probably leaning to bulk volume domains and sinkholing. This is more the technical analysis. Maybe some of the [inaudible] security that we discussed in Dublin like the [inaudible] or any security advice, pre-security response maybe. Maybe corporate responsibility when a domain is shipped via the registry onto the registrar, and the registrant gets some best practice advice. [inaudible] best practice, so that goes against the grain. Or some kind of documentation. Maybe examples in an appendix in terms of just giving as a flavor where you think registry is the best place to respond.

Nick, unless you've got anything more, I'm quite happy to read it more in depth and get a better more organized response next week, [inaudible] e-mail [if okay].

FABIEN BETREMIEUX: Any comments from you?

[NICK]: Hey, can you hear me?

FABIEN BETREMIEUX: Yes, we can.

[NICK]: No real actual comments from me at this time. I think I'd just like to follow-up on what [John] said. A huge thank you to the team for developing this. Quite a concise document in such a short space of time.

Again, we received it this afternoon, so we'll take it away and mull over some of these things, like the terminology on some of these issues such as abuse, malicious activity, etc. Thanks to [Stephanie] for her comment just now. Things like that we can take away, mull over, and see how we can further improve.

But yeah, initial thoughts are looks really good and thank you very much to everyone for the excellent work.

FABIEN BETREMIEUX:

Thank you, [Nick]. [John], you still have a hand raised. Is this a new hand, old hand? Okay. Are there any other comments or questions regarding the document or the discussion in the chat? If there aren't, Yasmin, can I suggest we maybe move on to a discussion of next steps in [inaudible] terms? And since I've heard [John] suggesting that the [PSW] provides formal response in a future conference call, maybe it could be an interesting discussion to exchange on when that call should be organized.

YASMIN OMER:

John, I guess I'll leave this up to you. As you can see on the call today, there are still a few comments from our end, from the registry end, that we will most likely have to incorporate into the draft. Did you want to wait until early next year to have that final document or did you just want to go ahead and review it?

My suggestion would be that you go ahead and review the document. I don't anticipate any changes that would be made as a result of registry

comment would be... Well, they won't be huge and we'll always provide a red line. I just wanted to flag maybe changes that are coming. However, it is my suggestion – and other registries please speak up if you disagree – that we provide that review in parallel.

And as we discussed in Dublin, there will be a few other iterations and reviews. Keep that in mind.

[JOHN]:

Yeah. Thanks, Yasmin. I think that's right to go ahead and review. Just on my mind is I know it's getting towards Christmas, but I think next week, I think you might just catch a lot of people with a lot of downtime and a quiet week maybe before Christmas, rather than in the beginning of January. I'm not sure we'd get the same reception. I think I can capture an audience more next week, and let's say by Wednesday or Thursday met some comments. It will be relied upon I think by certain members of the [PSWG] who will provide the meat and the majority of both those comments back. We have no anticipation at all. You won't look at those until next year. I think we've got time to do this and I'd rather get it done before Christmas rather than in a January [inaudible] after the Christmas period.

YASMIN OMER:

That sounds good, John. That works well for me as well – us.

FABIEN BETREMIEUX:

So Yasmin and John should [read over] the schedule [meeting] in mid-January around this [first] cycle of review and input and consideration

by the registry [inaudible], so then we can take stock of where we are and what we meant to be done towards finalizing the first draft.

[JOHN]: Fine with me.

YASMIN OMER: I defer to the registries that we think this is an appropriate timeframe, [inaudible] specifically had additional comments. I just wanted to touch base with you before we committed to...

JEFF NEUMAN: Sorry, what was the timeframe then for the... Because I noticed they're going to go back, review the draft now. I don't think much is going to change with the generics. I agree with you, Yasmin. I think all I'm going to do is just kind of do a separate section on brands and how it may be different and then talk to some of the restricted TLDs to see if theirs might be different as well.

So what is the timeline then in terms of like a full, complete first draft. Fabien, what did you say, did you think?

FABIEN BETREMIEUX: Sorry, [inaudible] end of January [inaudible] complete draft I believe from the [timeline] I shared. And that was to include the [inaudible] member cycles review, then contribution from the [inaudible] timeline we have from the ICANN 54 meeting to confirm. [inaudible]. If we can

come close to that [inaudible], but I would defer to you as to whether that's feasible.

[JEFF NEUMAN]: I think that gives us something to work towards.

FABIEN BETREMIEUX: Absolutely. So my suggestion was that we already schedule a meeting mid-January for the [inaudible] to reconvene and take stock of the various exchanges that will happen until then on the registry side as well as input coming from the [inaudible] side.

UNIDENTIFIED MALE: Okay. [Stephanie's] got her hand up, so I'll defer to her.

[STEPHANIE]: Thanks, Jeff and Fabien. My colleague [Rich] and I took a look at the draft, and I'm sorry for providing feedback late but we had some pretty significant edits that I think correspond well with some of the points made on this call, further clarification and specific circumstances in which we think the registry is the proper level. Some more clarification, how it would be defining abuse and misuse.

It's a pretty aggressive timeline, but I'm happy to work in the next couple of weeks to [inaudible] with folks on the registry side and try to get agreement by that mid-January date. For the most part, it's actually trimming the document down and refocusing it on the framework

because I think right now there's a lot of it that covers other elements of the reporting cycle.

So I don't think the text would be too contentious, but I'll coordinate to get input there [shortly]. Thanks.

FABIEN BETREMIEUX: Thank you, Stephanie. Yasmin, over to you. Is this an appropriate [inaudible] we have that there will be work on the registry side as well as in the [PSWG] side and that will take us to mid-January where we'll reconvene and take stock and again discuss if our target of January is realistic or whether that needs to be different.

YASMIN OSMER: Thanks, Fabien. That sounds, I think, [inaudible]. If for any reason it appears that we won't be capable of meeting that timeframe, I'll try to make the [inaudible] working group know as soon as possible.

FABIEN BETREMIEUX: [inaudible] go ahead and schedule this after the call. Stephanie, you have your hand raised. Is this a new hand, old hand?

[STEPHANIE]: Old hand. Sorry about that.

FABIEN BETREMIEUX: Okay. Thank you. [Nick], would you like to go ahead, please?

[NICK]:

Thanks, Fabien. Just as a bit of information I think for everyone on the call, the Public Safety Working Group is having a face-to-face meeting towards the end of January. I think it's the 28th of January in Brussels. Yeah, I'm sure hopefully we'll see what we can coordinate in terms of getting comments and feedback in over the next week or two.

But again we'll [inaudible] within the PSWG that they might want to take the opportunity of getting everyone around the table to have a final look at it before we feed something back in. So just a bit of an update in terms of activity going on there.

And obviously as everyone will know, there's a lot of attention within the members of the GAC at the moment is focused around getting comments in and bits and pieces of the accountability proposal. So there's quite a lot in [inaudible], but I think hopefully [inaudible] should be workable. Thank you.

FABIEN BETREMIEUX:

Thank you for your input, Nick, and [inaudible] on the PSWG side, I think [inaudible] work with the co-chairs to make sure that the timeline takes that into account.

Yasmin, maybe if we have questions from your questions, and [inaudible]. You referred into section six I believe to the registrar document. I'm just wondering whether you had shared this with the drafting team. I don't think I've seen it. I wonder whether it might already have been shared to the PSWG from a different channel, and

[inaudible] might also be a [inaudible] that could be interesting to add to the mix for reviews by the PSWG. So this is just a question [inaudible] suggestion.

YASMIN OMER: Theo, are you on the call?

THEO GEURTS: Yeah, I'm on the call. Let me comment on that really quickly. The document has been shared with the registries as a draft. However, the draft has undergone some significant changes after we shared it and is currently being finalized by Graeme Bunton from Tucows and our registrar stakeholder group, APRICOT. The plan is right now to release it somewhere next week if we are lucky. After our Dublin meeting, we had a timeline to release ten days after the Dublin meeting. However, we got quite a lot of comments and we had a lot of things to discuss there. So that's the status for that piece right now. And the title might change again, by the way. So there you go. Thanks.

YASMIN OMER: If I could just add to that, that registrar document is being developed by the registrar community. It's their own initiatives. So I don't know if it'll go out to the wider community through the public comment process per se. I haven't exactly spoken to Graeme about that. I don't know if you'd be able to shed light on that. But I just wanted to make the distinction between that document which is an initiative that's been led by the registrars and [inaudible], which is being pretty much brought

about because of the NGPC directors and is required to have a certain level of community engagement.

THEO GEURTS:

Yeah, if I can comment on that real quickly, Fabien. Thanks, Yasmin. I think in the interest of the timeline, we keep those separate. We will release the document to the entire community. If we would try to push it into this framework, then we will definitely not make the deadline. That would be a shame, actually, because the framework as it is now is being presented, I think it's a very [inaudible] piece. It requires some work, but as far as [inaudible] a lot of time in it. I can tell. So we keep it separate and we will release our piece to the entire community, and I will make sure that everybody on the list receives it just for educational purposes because that is basically what it is as part of being a setup to start a dialogue with everybody within the community and everybody outside if available. Thanks.

FABIEN BETREMIEUX:

Thank you, Theo. Is there anyone who is suggesting any or prescribing anything, just to be clear? I think it's useful that you're sharing your perspective [inaudible] decide what's the best approach.

THEO GEURTS:

Yeah, no worries.

FABIEN BETREMIEUX: I see that Nick has his hand raised. Is this a new hand, old hand? Okay, that was an old hand. Yasmin, over to you if you have any concluding remarks or if there are any comments or final comments or questions.

YASMIN OMER: No, that's it for me. Fabien, thank you all again for making the call. Again, the registries will continue to work with each other over the next month or so to hopefully make a January 15th timeline.

FABIEN BETREMIEUX: Thank you very much, Yasmin. Thank you all for your time, and unless there's any comments or questions, we can give you back three minutes. Thank you again for your time today. We will be in touch with the drafting team through the mailing list. I will certainly organize the call with the leadership to [inaudible] for the next few weeks. Again, we thank you for your participation.

YASMIN OMER: Thank you, everybody.

[END OF TRANSCRIPTION]