
MICHAEL KARANICOLAS: Okay, great. This is Michael Karanicolas, one of your co-rapporteurs, for the record. Thanks to all of you who submitted ideas for areas of inquiry as part of this subgroup. We got a lot of feedback and have substantially revised the thematic review as a result. So hopefully you guys have had a chance to review and we can start a discussion based on that.

Chris, do you want to say hello?

CHRIS WILSON: Sure. Thanks, Michael. Chris Wilson her, co-rapporteur as well. Thank you all for coming, and I reiterate Michael's thanks to those that provided some really helpful feedback, both on the last call as well as via e-mail in the last week or two. So we have a lot to look at. I think we're –

UNIDENTIFIED MALE: [inaudible].

CHRIS WILSON: Hello?

UNIDENTIFIED MALE: [Greetings]. Hello.

CHRIS WILSON: And I know there was also some good discussion about transparency on the CCWG main mailing list as well. For those that are on that list, I

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recommend you take a look at the last few days' worth of e-mails because there's some discussion there as well. But obviously the heavy lifting, if you will, on that issue will be with us, and Michael's way had a group of good overview.

Why don't I go ahead and turn it back to you, Michael, and then we can work from there?

MICHAEL KARANICOLAS: Sure. Just to give a little introduction to the way that this thematic document has changed. Once again, this document is basically meant to guide the scope of the subgroup's discussions going forward. The basic idea is that we, in this early stage of the process, have identified a number of issues to look at. That will be the sort of –

UNIDENTIFIED MALE: [inaudible].

MICHAEL KARANICOLAS: Sorry? After that, we can start digging a little more deeply into these issues and looking for specific problems or areas to address.

Some of your feedback jumped ahead, which was great and pointed out specific problems, so we'll obviously be incorporating that as we move forward.

But I do want to note that we rearranged the structure of the overview a little bit from the way that we had it previously, where originally we had it set out as four different categories; one for the DIDP, one for

interactions of governments, one for Board deliberations, and one for whistleblower protection. We restructured that slightly because basically I think that a useful lens to look at this is to think that disclosure basically comes in two forms. There's the proactive disclosure information that ICANN's going to be putting out proactively, and then there's the DIDP, which is the reactive form of disclosure, which is information that ICANN makes available in response to requests.

So basically, rather than looking at those individual issues for deliberations and interactions with governments as their own topics, we're bundling under the main thematic division of: how can we improve the DIDP, and how can we improve ICANN's proactive disclosure systems, along with improvements to the whistleblower protection policy, which remains on its own?

Based on the feedback that we received, we isolated a number of sub-issues. Why don't we throw that open to discussion at the moment? Should we discuss the first identification of issues? Is there anything missing? Is there anything that needs to be expressed a little more clearly?

I'm looking specifically at the sub-issue for improving ICANN's DIDP. Based on the feedback that we got, we expressed a number of areas to look into. Does anybody have any comments around those are areas that we've left out or need to be expressed more fully?

CHRIS WILSON:

Michael, I hear an echo from you. Folks who have their mics open or their phone lines unmuted, please close your mics and mute your

phones so we can hear Michael clearly and hear others speaking clearly. That's really helpful. Thanks. Sorry about [inaudible]. I just had to say that.

I see Dave McAuley has added some comments in the chat with regard to the CCWG final report focusing on the DIDP. Certainly I think that's right and it's obviously a large focus of this group's work, to be sure.

MICHAEL KARANICOLAS: Yeah. I think that there's no question that the DIDP is going to be a major area of focus. Potentially the biggest area of focus of this group – and we're going to look very carefully moving forward at the issues that were spelled out there. So absolutely I think that's an important area of focus.

Sure. Dave also mentioned free access to relevant information. I would expand that out because, working on the government side, the word "relevant" tends to be a bit of a red flag to me because that suggests that public body or the ICANN, in this case, would be determining what is or is not relevant and that information would be denied if people that it wasn't relevant to a particular inquiry. We always tend to say at the governmental level that it's up to the requester to determine whether information is relevant or not. So I would expand that out to say free access to information, rather than just free access to relevant information. But certainly free access is an important part of that.

Is there anyone else who wants to – oh, I see a hand up for – that's David, and he's I guess typing in his submissions.

DAVID MCAULEY: Michael, hi. It's...

CHRIS WILSON: David, go ahead.

DAVID MCAULEY: Thanks, Chris. I just wanted to add to what Michael just said about expanding beyond relevant. The point of what I was typing in was simply to note again that there are interdependencies between our subteam and others, and the language that I typed in was from the annex from the CCWG, the final report, that deals with the IRP process. The IRP process is really looking to our group here in transparency to deal with DIDP such that it satisfied the needs of the IRP group. That's why I underscored the phrase "free access to relevant information."

But I certainly understand your point about how maybe we'll go beyond that. That's fine. But it's important to note to this group, to our own group, that the IRP is looking to us as well.

Thank you very much.

MICHAEL KARANICOLAS: Okay. Thank you for that. I see Sonigitu with his hand up as well.

SONIGITU EPKE: Thank you. I think it's important that we also note that this information that we are going to be gathering needs to have some relevance on the

spreadsheets, like the use of [inaudible] data to collect certain data-related information. Would that also be included?

MICHAEL KARANICOLAS: Yeah. I had a bit of a challenge hearing you because of the echo. I got data-related information.

SONIGITU EPKE: Yes.

MICHAEL KARANICOLAS: Can you explain that out a little more, please?

SONIGITU EPKE: What I'm saying is that, if we have the very relevant information we need to get, then can we have them on spreadsheets so that we'll be able to identify what information we need to pick at the particular [inaudible], rather than free access to information?

MICHAEL KARANICOLAS: Okay. This raises a very important issue. I would interpret that as being more closely related to theme #2 because, if I'm hearing you correctly, what I'm hearing is a need for accessible and data that's distributed in a way that's easily manipulated.

SONIGITUE EPKE: Yes.

MICHAEL KARANICOLAS: In other words, it's important to provide information in a way so that you can – for example, rather than sending it out in PDFs, just sent it out in Word documents where it can be cut and pasted, or in Excel files and CSV files and things that can be easily transferred from one medium to another to allow the data to be processed more easily.

Is that what you're getting at?

SONIGITU EPKE: Yes.

MICHAEL KARANICOLAS: Okay. Excellent. So that's certainly something that's going to be under #2 in terms of more about proactive disclosure, but certainly interoperability of data and data accessibility is I think going to be an important part of the recommendations.

Okay. Does anyone want to comment on the first sub-theme? Does that look good? Okay. Not seeing any more hands, I guess we'll accept that as being our framework for the discussion going forward for the first sub-theme.

In terms of the second sub-theme, improving ICANN's proactive disclosure systems, we're going to discussing what material ICANN should always be publishing as a matter of course. So rather than waiting for a DIDP request, this is information that, as soon as they get it or as soon as they process it, it automatically goes online.

Are there additional areas that the group wants us to look into beyond ICANN's interactions with governments, ICANN's interactions with external advocates, and Board deliberations, as well as reporting around ICANN's conflicts of interest policies? Are there any other data heads or areas of inquiry that you think we've left out there? I don't see any hands but I see typing, so let's just wait and see.

Okay. We're still trying to find a source of the echo, so unless – oh, I see a hand from David McAuley.

DAVID MCAULEY:

Thank you, Michael. I'm wondering: does this cover financial transparency? I noticed a lot of discussion with Xavier on the list, and I know that in the financial area there's things that ICANN should be disclosing. There's other things that they can't for confidentiality reasons, etc. Do you feel that Subteam 2 covers the financial area adequately?

Thank you.

MICHAEL KARANICOLAS:

I think that's certainly relevant to our area of inquiry, and we can and should certainly add that in there; a question of financial transparency and transparency around budgets and expenditures. That's a crucial area. Probably I would put that under #2 rather than #1 because I would feel that that's information that should be proactively disclosed. I think that's a great idea to add that in.

CHRIS WILSON: Just to add to that, I think it is instead perhaps implied in part, at least with regard to perhaps 2A and 2B, because I know that some of the specific transparency data points that we're obviously interested in is how much money is spent on such interactions and external advocacy, etc. But I know that was a point of discussion I know Brett raised with Xavier and others on the CCWG list.

So I think, to your point, it's certainly an undercurrent of consideration, and we can make it more specific. We certainly can do so.

MICHAEL KARANICOLAS: Yeah. I'm just making a note to add a specific head for financial transparency or budgeting transparency. I think that's excellent.

I see Brett typing: "Transparency reporting should not be quick, but also with enough detail to actually be transparent?" Yeah. I feel like you're touching in values that we want to see in an effective transparency system, so speed with which information is – in terms of the rapidity of responses, first of all, you have how quickly you get responses to your DIDP request. In addition, on the proactive disclosure side, how long do people have to wait before material goes up on the website and with enough detail?

In terms of the details, in terms of the DIDP, I would hope that you'd just get the material that you ask for. So if you request documents that ICANN holds around particular issues, they should be giving you documents they have. So the detail issues shouldn't be there because you should just be getting the original information. That can impact proactive disclosure systems.

But I do think that the two things that you mentioned, speed and having detailed responses, are cross-cutting themes, I guess, that we can identify as factors that we want reflected in the system, as opposed to specific areas of inquiry, if that makes sense.

Okay, great. Are there any other areas to add under improving ICANN's proactive disclosure systems? Bear in mind, this is, as we look into this, an area that we can – I'm assuming that our recommendations at the end of the day are going to include a specific basically list of information that should be published proactively. That's what you see in better practice organizations and governments around the world. This list is not the be-all and end-all. We're just identifying broader areas.

If people have further things to add in later about information they want to see published proactively, we can certainly add that in. But for now, are people happy with the theme #2 on proactive disclosure?

Okay. Not seeing more hands, I'm going to move us on to issue #3, which is improvements to whistleblower protection policy. Now, I circulated just yesterday a couple of documents that I got from Samantha I think it was, from ICANN, sent on to me, basically documents that were mentioned in the last call that are ICANN's review of these systems.

In addition to that, we got some feedback of a lot of very valuable details that [should be] included in our examination of the whistleblower protection policy and the factors that we want to look at to question whether it's done properly and how it could be done better.

So we've isolated those in Section #3. I think it's a very good description. I would welcome any further commentary or additional areas that people want to mention.

Okay, yeah. Yes, thanks so much, Barbara. Yeah, do you want to speak?

BARBARA WANNER: Hi, can you hear me?

MICHAEL KARANICOLAS: Yes.

BARBARA WANNER: Okay, great. I've been having problems with the Adobe. I'm terribly sorry. I just wanted to thank you for forwarding that other document to us a couple of weeks ago that I think was based on Canadian practices because that had some, I think, very useful tips of questions we might want to zero in on when we examine this.

But I think what I found most troublesome was that I had a terrible time even just finding this on the ICANN website. Maybe I wasn't keying in the proper terms. I was using "whistleblower." I had some documents come up from prior ATRT work. That in and of itself to me is indicative of a need to refine this approach. Just though I would mention that.

Thank you.

MICHAEL KARANICOLAS: Yeah. I think your inputs were certainly excellent. You do raise an excellent point, where there's no point having a whistleblower policy if people don't know about it. The whole point of the whistleblower policy is that you are encouraging people to come forward, so if that's not accessible – if not only can people not access it, but beyond the simple matter of accessibility is the question of: you should be actively educating your employees and the public. You should be [inaudible] policy. You should be emphasizing it.

So I think that that first point is about clarity and availability and employee education, but we added in an important part of that. We also added it to several other new sub-heads based on this, which I think fleshed the issue out more clearly.

Avri asks, "Do they feel safe using it?" That's a trickier thing to work on to address through the design of the policy itself, because that impacts the culture and level of comfort that whistleblowers themselves feel comfortable with. But really, all you can do is establish a good policy at this point and then follow through on it and hope that that builds a situation where employees feel comfortable using it, I think.

But, again, we're at this point I think more interested in reforming the policy because that's the avenue that's open to us.

ALAN GREENBERG: It's Alan. May I get in?

MICHAEL KARANICOLAS: Oh, please.

ALAN GREENBERG: Okay. A couple of things. I was on ATRT2, and we're the ones who caused those documents that were just mentioned to be there on the web.

First of all, it is not either called a whistleblower, nor was it designed as a Whistleblower Act. So that's part of the reason that getting the documents – many organizations are proud of them and publish the process on the web, which ICANN certainly doesn't.

However, in terms of accessibility to employees, we were told – but I have no way on verifying it – that, on the internal website that employees can access – there's a whole intraweb and manuals and things that the public doesn't see – the information is more readily available and that there is education and stuff about it. I have no way of verifying to what extent exactly what that looks like or how evident it is, but supposedly to someone who has employee access to the ICANN website, there is significant information available about it. Just for the record. So what we're seeing is not necessarily what employees see.

MICHAEL KARANICOLAS: Sure. I see Samantha was typing something, so she might have an answer.

ALAN GREENBERG: Okay. That's fine. I just wanted to mention it.

MICHAEL KARANICOLAS: Okay. There it is. “Will [this] be final for the tenure of the subgroup?” I wouldn’t consider this list to be a limitation on our mandate in the sense that, if people identify additional issues which aren’t here – I don’t think we’re going to down the road say, “Nope, can’t look at that because it’s not on the list” – I certainly wouldn’t take that kind of a rigid approach. I don’t think that’s beneficial.

But I would encourage you, if you have additional issues, to [state them] now because I think that this is meant to hopefully frame out the conversation that we’re having. So it would be good to have it as comprehensive as possible at this stage.

CHRIS WILSON: This is Chris. I –

MICHAEL KARANICOLAS: And I –

CHRIS WILSON: I’m sorry. Go ahead, Michael.

MICHAEL KARANICOLAS: Oh, no. Please. I was going to move on to what Sam had said, but please go on.

CHRIS WILSON: I was just going to echo your comments and also note that the entire new governance structure that we will be embarking on within ICANN is

meant to be an [inaudible] structure. It's meant to be able to be worked on and improved upon as time goes by. I see no reason why that would not also apply to the concomitant Work Stream 2 subgroups as they do their work this year and obviously well into next year and so forth.

So I think there's an expectation that we can be flexible. Obviously we have our additional mandate from the CCWG report, and we work off of that, and then adjust accordingly if we need to. I think we're all on the same page there.

MICHAEL KARANICOLAS: Okay, great. I'm just responding to the issue of availability of the whistleblower protection policy. Samantha has noted that it is posted in each office available to all employees and circulated annually for confirmation included in training. So that's good.

On the one hand, you could argue that the availability to ICANN employees is the most important thing, but at the same time, we're talking about transparency, and it is important, if we're going to be examining the policy, it should be not only available to us but also available to the public in the sense that this is a way of building of confidence in ICANN's operations. Potentially, if we have a good policy there, I think that we could be thinking about ICANN as serving as a model to other organizations, hopefully. So I think that there's certainly a strong public interest in broad availability, and that's certainly something that we'll look into.

It would be good to get more information about what kind of material is circulated to employees, so I wonder if, Samantha, you can forward

those documents around to us so that we can review what employees are told. Or do we need to put in a DIDP request?

SAMANTHA EISNER:

We send out the policy, actually, on an annual basis as part of an affirmative confirmation. Other times that it's mentioned is in trainings, where we make sure that people understand the availability of it. So that would be identified in multiple places.

There's also just our day-to-day interactions. If I ever talk to someone about concerns about going on and they're not sure what to do, I always make sure that I mention availability the anonymous hotline. I also encourage any managers that I talk to to recall that that's available and to encourage their staff to make sure that it's available. So it happens also on in-person, day-to-day bases.

MICHAEL KARANICOLAS:

Okay. That's great. You mentioned the things that are sent to employees, the things that are circulated. Is it circulated just as the policy itself, or is there a guide that you send out? Do you know what I mean? Is there a little user-friendly-type manual or something like that?

SAMANTHA EISNER:

It typically goes out as the policy, and it's available as the policy. Then there's a procedures document that goes along with it. Both of those were provided to the ATRT2 and then also were in the process based on the review that happened. We're in the process of updating those documents to align with the recommendations from the review.

MICHAEL KARANICOLAS: Okay. So it's currently being revised?

SAMANTHA EISNER: Well, yes, because we went through the review. When you get recommendations that it should be modified – they were small modifications. If you looked at the report, they didn't offer any wholesale overhaul of the policy, but we are taking the recommendations that came in and making modifications to the policy.

MICHAEL KARANICOLAS: Okay. Do you know – right. Brett just asked what I was going to ask. What are the timelines for these revisions because obviously we're going to be making our own recommendations, and it would be good to comment on the revised policy rather than – we don't make to make recommendations and then have the issues that have already been addressed. We don't want to be redundant, is what I'm saying.

SAMANTHA EISNER: Right. Yes. I don't know the final timeframe. I can discuss with the department that's responsible for updating it. So I can find out that information and provide that later to the group.

I think it would be helpful from the point of view from staff. I'm on ICANN staff, obviously. It'd be helpful to understand. It sounds like there are a couple different lines of work that this group is considering for the whistleblower policy. One would be: how available is the policy stuff? How available is information about the policy?

There are two aspects to that. There's the employee [inaudible].

CHRIS WILSON: I think we lost Sam.

MICHAEL KARANICOLAS: Oh. We just lost you. Yeah.

CHRIS WILSON: Sam, we can't hear you, so if you maybe want to dial back in, that'd be great.

MICHAEL KARANICOLAS: Okay. I guess, until we get Sam back, maybe should push on a little bit. I'd maybe just flag this as areas of inquiry where, first of all, we should bear in mind that there is a current revision process, so we're going to need to be mindful of that and watch that as it unfolds and potentially revise our approach of what we want to say based on changes that have already been made.

Second of all, I think it's useful to consider accessibility, although obviously Sam has offered some very important insights that the ICANN staff are informed informally as well as regularly about the whistleblower policy.

I see she's typing, so I'll just let that...

ALAN GREENBERG: It's Alan. May I suggest that Avri and I, both of whom were on ATRT2, put together, when we get to this item in our overall work agenda, a brief presentation or just a summary of what ATRT2 found and what the concerns were expressed there? That's probably a good starting point.

MICHAEL KARANICOLAS: Yeah, absolutely. I think that would be excellent, yeah.

ALAN GREENBERG: Okay.

MICHAEL KARANICOLAS: Having discussed the three issues, I've made some notes about changes to make based on this conversation. Pending another comment from Sam, does that take us on to the next phase in the agenda, which is Next Steps and Further Research?

CHRIS WILSON: I think so, Michael. I think the thinking here is obviously we've got a good outline laid out, and I think at this point we may start getting a little more research done on the issues that we may not be fully up to speed on. My thought also was including looking at, for folks, especially with regard to the DIDP process, getting even case studies, if you will – real-world examples of both failures and successes with the process.

I know Mike Rodenbaugh had e-mailed the list I guess yesterday with the example of his opinion of failure of DIDP with regard to a certain particular client and issue he was dealing with. I know Philip Corwin and

some others have raised some real-world examples in their work with ICANN.

So personally speaking, I think it would be nice to get more, if there are more of those, to lay them out, and we could certainly figure out if there's consistencies among them or not; so start thinking about where the problems are from our perspective and getting a lay of the land in that regard.

I don't know if others feel similarly, but I think that's something I thought would be helpful. I welcome other comments from folks.

I see Brett has made a comment in the chat. I have not personally seen them, so perhaps, Brett, if you could locate those studies or others and send them to the Transparency Subgroup, that would be very great. That would be helpful.

For others, this may be redundant, but there may be others in this subgroup that haven't seen them, so I think it'd be good to resurface those and look. But certainly to the extent that there are folks that have done this on our own that maybe not be in that study or studies, I think that would be good, too. If you are part of this group, and you have real-world experience with the process, it'd be nice to hear from you on that.

MICHAEL KARANICOLAS: Yeah. I think that's a great idea. First of all, certainly we should be circulating all the background material that people have done is a great starting point. I also think that it's very useful to get more information about people's experiences and frustrations with the system.

I do want to caution that I think in a final report we should try to take as constructive a tone as possible in terms of – I don't think we want to submit a bunch of – I think that we should frame our final comments as recommendations rather than just as expressions of frustration. But at this point, certainly hearing more about how people have engaged with the system and how it hasn't worked is certainly extremely helpful to frame where we want our improvements to target.

In terms of avenues forward, circulating more background documents is always useful, and I think that's going to be an ongoing thing that we're going to be trying to do.

In terms of these different issues, the broad way that we want to do this consultation – the broad vision that we had was to first identify the issues, then identify the problems, and then try to identify solutions. Having identified the issues, the next phase of it would be to start digging more deeply into these different issues and finding specific problems that we've seen.

For example, we got that e-mail from Mike yesterday taking about his complaint about the use of the legal relationship – the exclusive client privilege exception. We would list that as a specific problem under Overuse of Exceptions.

Basically, to flesh this out more – this current paper – in terms of finding specific issues that we might want to improve on, in terms of our avenue for that, we could potentially sub-divide and have people focus on different issues, or we could keep it as a broad consultation and basically have people contribute as they like.

Does anybody have any thoughts or commentary on how you want to contribute or how you want to structure the next phase?

Okay. Without any – oh, okay. Yeah. I completely agree, Philip. Again, I don't have the DIDP system that you do, but that doesn't surprise me at all. I think that there's a natural tendency among all institutions, actually, towards withholding information because I think there's a natural resistance that I've seen, certainly in every institution that I've ever worked with – and there's been a lot – towards resistance to transparency just because there is suspicion and hesitation about putting material out there. You don't know what's going to be done with it. It might make you embarrassed. It might make you look bad. You don't know what the researcher or what the requester is looking for, so there's certainly a resistance that I've found in every governmental or intergovernmental organization or international financial institution that I've worked with on this. So there's a natural institutional resistance to that, and that's why you have to structure the DIDP to put clear rules in place about disclosure to try to anticipate and try to cut off that resistance. Basically, you have to draft the policy in such a way that it minimizes discretion to resist disclosure.

Whether or not we export that to the Ombudsman and that's the solution, or to a specialized officer, that's a challenge. I also think that one of the other things to discuss – I'll just raise this issue now; I don't really have a proper answer to it – our work does dovetail with some of the other working groups. There's a working group that's discussing Ombudsmen specifically. We're obviously going to be looking at the role of the Ombudsman and potentially how that engages with the transparency system. So there's going to be an interesting interaction

between what we look at and our own recommendations and what the other subgroups are looking at. So that's just to flag that as an area of interest now, and that's something to think about.

That being said, having not really heard from anybody who wants to jump in and grab a particular topic, I'm going to suggest that we keep it fairly open-ended now. Basically, our plan forward for the next couple of weeks is that we continue to circulate background material as well as to let people just plug in information as they like towards specific issues that they want to see addressed, and, as a broad structure, we think about identifying issues broadly within the next couple weeks. Following onto that, we'll try to make more specific expressions of the problems that we see within that.

Does that sound good?

Okay. With that being said, I noticed that there might have been some issues with the Google document. I'm not sure I set it up properly to allow people to feed information into it, or maybe people just didn't want to feed information into it. We tended to get a lot of responses back by e-mail and not so much through the Google Doc. I think that we'll keep it up until the next phase, basically in the same thing where I'll set up another Google Doc, but people are free to just e-mail their suggestions as well.

Basically, the next phase of the process, in addition to circulating more information, will be to look within these subjects that we've identified and list specific problems that you see or specific areas that you want to see addressed.

CHRIS WILSON: Let me just add that, logistically speaking, when folks do chose to e-mail that information to us, please e-mail the entire subgroup list. I know in a couple of cases we got direct e-mails just to you and me, which is certainly find, but I think for the benefit of all, it'd be good to get that information out there for everyone to see. It makes it easier for everyone to know what we're all talking about.

MICHAEL KARANICOLAS: That is certainly the more transparent approach, so that's one that we should whole-heartedly endorse, I think.

Yeah, thank you, Brett. Yeah, those are the two background papers that I've seen. I feel like there was one or two others, but I'll take a look back.

Anyway, I think that covers our Next Steps Forward. I guess the last thing to discuss is Any Other Business.

CHRIS WILSON: I'll just say for folks, to remind them, that the next call we will have will be on September 1st at 05:00 UTC. I know for some of us that will be a very early morning call, but nonetheless, we're trying to rotate the call schedules for people in different parts of the world. So the next call I think will be two weeks from today, Thursday, September 1st, at 05:00 UTC. The [inaudible] information will likely be the same, but it'll be circulated by the Secretariat a day or two in advance of the call. So that's the next time we'll be chatting on the phone.

MICHAEL KARANICOLAS: Yeah. Just to follow up briefly, Mike – what was the last name?

CHRIS WILSON: Rodenbaugh?

MICHAEL KARANICOLAS: Mike Rodenbaugh, yeah. He mentioned to the group that he couldn't make this call but wanted to stress the need for written dialogue for people who can't make these calls. I'll just say that I'm very much on the same page for that. I think that Chris and I believe in that very strongly, and that's why we structured things to try to format it is a written consultation as well. So we're going to be circulating this policy, so for anything that you want to say or feed into this, written recommendations are absolutely okay.

We use these calls as a way to continue the consultation as an ancillary aspect to it, but certainly I think that we see the written aspect to it as a very strong part of the process, and we want to make sure that people, even if you can't make the calls, can pitch in and can be part of the process.

Unless there's any other business, I'm going to suggest that we adjourn until our next meeting in a couple of weeks. In the meantime, please do circulate any background material that you find, as well as suggest any specific issues that we should be addressing related to the DIDP, the proactive disclosure systems, or improvements to the whistleblower policy.

CHRIS WILSON: Thank you, everybody.

MICHAEL KARANICOLAS: All right. Thank you.

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