LAUREEN KAPIN:	Welcome, folks. Unfortunately, [inaudible] had some family emergencies and likely won't be joining us today, so we may need to shift her recommendations to next week. And I'm expecting that Carlton will be joining us since he circulated his revisions and was responding to e-mails very recently. So that means we're going to start with Calvin. And Calvin, I know you had circulated your recommendation regarding 24. Did we see your new versions of 17 and 18 which have the details and the success measures, or did I miss that?
CALVIN BROWNE:	I recirculated my revisions. I haven't put the success measures in for 17 and 18.
LAUREEN KAPIN:	Okay, so we'll need to see that so that we can close it out. So let's start with 24, which you have circulated your recommendation to delete that, and I thought you could walk us through it, and then we can discuss.
CALVIN BROWNE:	Okay, sure. Let me just get it up on my screen. [inaudible]
LAUREEN KAPIN:	I think it's also onscreen. Yes? Is it onscreen for you, Calvin? It's onscreen for me.

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.

CALVIN BROWNE: Yes, I've got it, I was just looking for my local copy, and there you go. So yes, I started off, and I basically list the recommendation. And that recommendation was to initiate discussions with relevant stakeholders to determine what constitutes reasonable and appropriate security measures commensurate with the offering of the services that involve the gathering of sensitive health and financial information. Such a discussion could include identifying what falls within the categories of sensitive health and financial information, and what metrics could be used to measure compliance and the safeguard.

So what I did is I went back and I traced the genesis of where this recommendation comes from, and it basically had its start in the GAC Beijing Communiqué. And I've got that point specifically out there from page 8.3, and it says that a registry operator will require that registrants who collect and maintain sensitive health and financial data implement reasonable and appropriate security measures commensurate with the offering of these services as defined by applicable law and security as recognized in industry standards.

So that's what the GAC originally sent, and that gets distilled in the new gTLD framework, and what they basically do is they almost do it word for word, except that they go and they drop the recognized industry standard. So it says, "Registrars to include in their registration agreements the provision requiring that registrants who collect and maintain sensitive health and financial data implement reasonable and appropriate security measures commensurate with the offering of those services as defined by applicable law."

So again, it comes down to applicable law. And then I actually just went and got the exact text that made it into the agreement, and I took it from the policy one for example. And again, it's almost exactly the same there, and again, it has that bit "by applicable law." I went and examined the actual agreements just to see exactly what applicable law is. It's not defined per se, but it is referred to in a couple of places, and it leads me to believe that the applicable law would be where the registrant is incorporated, or where the registrar conducts their business.

But in all cases, it really comes down to applicable law. And what I'm concerned about, Chair, is that this stuff, what constitutes reasonable and appropriate security measures, as we tossed in somebody to go and, well, ICANN Org to go and investigate, is already defined. And I've put that in bold in my thinking there. So it's already defined, and mainly it is defined by applicable law. That's exactly the stuff that was put into the agreements. It's what the GAC wanted. It's slightly less than what the GAC wanted. They wanted industry standards in there as well. But nothing that we can do, no process that we initiate, in my opinion, would actually trump what is already defined here in applicable law.

I also go on to say that there are two things that I think – well, there are actually a couple more, but really, the applicable law is quite [inaudible] because these registrants could be all around the world. That could mean every jurisdiction, hypothetically. And it really is a [inaudible] to try and go and collate all of this, as well as even determining whether the services that these guys offer are actually caught in this net. So it really is open-ended. And my thinking is that the recommendations put forth in recommendation 23 for getting more granular data actually

helps us with the main nexus of what we're trying to achieve there, and that's to actually see if this has been effective or if it there has been a problem there and so forth.

So I think we might be overstepping in terms of timing of doing this, but more importantly, going back to the fact that what we're trying to do is already defined in the agreements, and I think that therein lies the rub. And hopefully, I've put it down as succinctly as I could.

LAUREEN KAPIN: Okay. Thanks, Calvin. And let me applaud you for first of all your careful reading and the way you've laid out the history, because I think that that's very useful. And to summarize, just to make sure that I'm understanding your position, your recommendation is to eliminate this because, one, you feel that it goes beyond the contract provision which is asking the contract holders to look to existing law as they define what's appropriate for protecting sensitive health and financial data, and I think that's the gist of it.

I have a couple of questions for you. One, I know you took a contract provision from the .pharmacy agreement. Did you look at other – I guess my question is since .pharmacy in many instances goes beyond what's required by the base contracts, I'm wondering if you looked at other contract provisions also. And the reason I'm asking is my intent is to make sure we're actually seeing the minimum required for all the contract holders in highly regulated categories.

CALVIN BROWNE: Okay. So I had looked at at least another contract. I can't remember exactly which one. And the exact same language was in there. Are you talking about other language in the same contract, or are you trying to determine whether it was [inaudible] to each contract?

LAUREEN KAPIN: I'm trying to determine what's the minimum language regarding Spec 11(3)(g) for highly regulated contracted parties, because .pharmacy may not represent the norm, because in many cases they've gone above and beyond. And in this case, it may actually be the actual language, but without actually going back to other resources from ICANN itself actually and their Spec 11, which I don't have in front of me. I can't tell if this is the minimum required or this is something that .pharmacy has done on its own that is a little different. That's my question.

CALVIN BROWNE: Sure. My thinking – and I can go and confirm it if you feel necessary, but from my understanding, my reading of this whole thing that this language has made it into all the contracts as a minimum for those ones that got caught in the GAC net in terms of this category one [inaudible].

LAUREEN KAPIN: Okay.

CALVIN BROWNE: It was just purely coincidental that I picked .pharmacy. I went through the list and it was [inaudible] one thing there. I know I did check one

other one at one stage that when I was putting this together, I specifically randomly chose this one, not – I'm quite prepared to go and take it and affirm that, but my thinking it is part of the minimum spec and has made it into probably all of them. I don't know how good a job it would be for me to go and check all of them, because there are quite a few strings, but yes.

LAUREEN KAPIN: Okay. So that's just a side question. So let me open this up to the group, and then I'm happy to – I'll weigh in also, but let me open it up to the group first for questions and comments.

DREW BAGLEY: Great job, Calvin, going into this analysis and taking a look at – as you mentioned – the genesis of where it all came from, and then attempting to find an applicable, implemented example. Yes, I like the reworded or consolidated recommendation, and I'm just wondering if in addition to the language that the new recommendation has, there is something we could throw in another sentence in general about just minimum security standards. Because even though we don't know what constitutes reasonable and appropriate security measures for sensitive health and financial information specific to the domain name system, we in general know the bare minimums from the laws of all of our on countries or some of the best practices already of the security community where we could at least have some language that discusses encryption at rest and in transit, and perhaps also data retention practices and things like that.

So I don't think we need to completely shy away from being a little more specific with those things. It talks about how such practices should include a look at – and then we could list those things as far as encryption and data retention practices and whatnot, so all the stuff we know are best practices when attempting to prevent a data breach.

CALVIN BROWNE: Yes, okay, so let's think about that, because Recommendation 23 is actually going about getting more data in terms of breaches, so it actually sets about to asking ICANN to actually show a little bit or to try and collect a little bit more data when it comes to these complaints, and then what 24 does it says, "Well, let's go and investigate what these things should be." And I've come back and said, "Well, it's really defined what should be." Now what you're saying is how about we leave some kind of recommendations of standards in there. Am I getting you right there, Drew?

DREW BAGLEY: Yes, like a bare minimum. So we're saying, "Alright, we need to go and figure out what the best practices are to develop standards," but we should add a sentence that says something like such standards should at least include specificity around encryption practices both in transit and at rest, as well as data retention policies, because obviously we don't want someone's sensitive health data to be kept years longer than it needs to be, things like that. We should just have a sentence that I guess provides a little more guidance, so that way, whatever – assuming our recommendation is implemented, it's not implemented in too vague

of a way where – I guess that's what I want to avoid. I would hate for the best practices to come out and just be so general and vague. So maybe if we're a little more specific in our direction, then that could lead to more granular and specific best practices. It's just an idea though. What are your thoughts on that? Because obviously, you've gone through and looked at this from every angle.

CALVIN BROWNE: Yes. Look, I was actually saying that we strike the whole recommendation, mainly because these things are already defined, and that definition is as per applicable law, which could be anything, depending on where the registrant is, because the registrant could be, I don't know, some [inaudible] sites in Senegal or South Africa or Argentina, and the standards required for them to meet would be defined by Argentinean law or whatever the case may be. So the thing that treats me to this was the initial thought that it seems strange that we're now going to go and set up a process that will now determine what constitutes these appropriate security measures, but it's actually defined already. It's what the law says. If the law is silent on it, then the law is silent on it. If the law is developed on it, which it is in the EU, for example, and the GDPR then it makes sense to use that. So I'm not sure that we can be half pregnant on this one.

DREW BAGLEY: Yes, I'm just saying that the reality is they're dealing with a global resource for which we already have global security standards in terms of the safeguards created as part of the New gTLD Program and whatnot.

CALVIN BROWNE: Absolutely.

DREW BAGLEY: Everyone should follow applicable law, but I'm saying also maybe we want to be a little specific with what might be global best practices for protecting this data [inaudible] with the DNS.

CALVIN BROWNE: Yes. Okay, so I've got you, and my answer to what you're saying there is that this provision actually doesn't concern the central DNS stuff at all. What it actually does is it concerns the data that is collected by registrants in the services that they run behind these domain names. So it actually goes in and delves with content on the websites or the services that the registrants, not the registries, not the global stuff. It reaches down past the registries into the end user registrants themselves and it talks about health and financial information that the registrants themselves collect. Does that make sense, Drew?

DREW BAGLEY: Yes. And that's absolutely a fair point. I guess I'm seeing the side of it where we're having a regulated TLD that is being permitted to restrict registrations and whatnot. I'm thinking about that at the registry level, and therefore you would hope that would go with it would be some sort of security obligations. But yes, obviously down at that micro level when you're dealing with the content of the webpages themselves, then it's a completely different realm.

LAUREEN KAPIN: So I'm going to –

DREW BAGLEY: Sadly I have a hard stop here in a minute, so those might be the thoughts that I'm leaving you all with, whether they're good or bad. And now unfortunately I have to leave for work.

LAUREEN KAPIN: Thanks, Drew, for participating. I'm going to jump in, because for time management purposes I also want to make sure we get to Carlton. So did we get any public comments on this, Calvin, objecting to this?

CALVIN BROWNE: We got public comments. Not objections to this per se. If you just give me a second, I'll pull up my document. I've got that in – I know where that is, just give me a sec. And I've got a brief rundown of them. Okay, so the Registry Stakeholders Group, their comment was that we do not provide a rationale for this. I kind of think we did, but yes. [inaudible] they basically urged moving forward on that one. The Business Constituency said that the registry should still comply with the base agreement. The GAC – I can paraphrase – is saying that they basically supported our recommendation. The Noncommercial Stakeholders Group is about the most opposing one. So they went and said that this seems to extend to content, and if it does extend to content, they're opposed to it. Otherwise, they want it to be clarified not to include

content. So the Noncommercial Stakeholders Group was the most opposed to this.

The UK government put in a thing on this which I don't understand, that basically says that registries should help combat child abuse content. And ICANN Org says we did not specify the intended use of the information, and it would be helpful if we could clarify the intended use and by whom to ensure the appropriate data analyses are performed. I think that also relate to 23, because 23 and 24 are linked or grouped together really as well.

LAUREEN KAPIN: Okay. So it sounds like some support, some opposed, and then your concern basically is that the contract says follow the law, and we shouldn't be asking them to go beyond it. My observation is – although ultimately, it's up to the Review Team – I think this recommendation wasn't – was it added based intended to go a little further than the contract provision and be consistent with the GAC advice as originally posed which had this reference to industry standards? And that this recommendation is really getting at allowing discussions between the relevant stakeholders to determine what constitutes these best practices. We don't put it that way, but that's a way of looking at it concerning this information.

But it's not imposing any additional requirements or even suggesting any additional requirements. I think this is just a way to have the stakeholders discuss what's an issue that's been identified as important by the data we've collected from end users, and it's a particularly

sensitive area in terms of consumer trust. And then figure out if there's a way to measure compliance with the safeguards. So in that respect, I don't share your concern. I think your observation is accurate that this goes beyond the applicable law definition, but because all it's calling for is a discussion about what are these practices and what constitutes sensitive health and financial information and what metrics. I don't think we need to eliminate it.

That said, you raised a fair point, I just don't think the recommendation was originally intended to map the contract provision. I think it was intended to go beyond that, because there's so little information about whether there are lapses in this regard and how contracted parties are complying with it. So that's my two cents.

Other thoughts or questions on this? Because ultimately, we'll need to make a call on it. I mean I do appreciate your point that 23 calls for getting more granular about complaints, and in that respect, part of this will be addressed just in terms of collecting more information.

CALVIN BROWNE: Yes, so I was going to talk to that and say exactly that. So you beat me to it.

LAUREEN KAPIN: Sorry.

CALVIN BROWNE: No, that's fine. As the recommendation currently stands, I'm a bit worried about it, and as I've put together in my analysis there, I think it's an impossible task to actually go through. And if you're talking about applicable law which was originally in the GAC's text as well, I think it becomes a huge mammoth task to try and go and determine all of that. That really seems difficult to me. But anyway, specifically because the applicable law could be anything, what I did point out was the dropping of the recognized industry standards. Because that wording was in the initial GAC advice and got dropped in the going through to the next stage. So I think that's kind of what you're saying. Anyway, I'm not too sure how to proceed, because I guess we've got two different opinions here at the moment, or recommendations.

LAUREEN KAPIN: Well, we can take a sense of the folks on the phone, because that's who's participating in our subteam call. Since we've gotten a chance to discuss our views. So I think we should get the sense of the folks on the call about who is in favor of striking [inaudible]

UNIDENTIFIED FEMALE: The host has left the meeting to speak with meeting support and will rejoin soon.

LAUREEN KAPIN: Can everyone still hear me?

UNIDENTIFIED MALE: Yes.

LAUREEN KAPIN: Okay, good. So what I'm going to ask then is to take up Calvin's suggestion, which would be to strike Recommendation 24, and to use your voting button if you are in favor of striking Recommendation 24 or opposed to it. And I think you can – yes, you can do "agree" or "disagree" if you're in Adobe Connect. Okay, well, it looks like more people are… "[inaudible] not working for me. Does that mean we don't have…" Okay, well, it looks like people are in favor of striking this recommendation. Then that's what we should propose to the – I have two votes. Thank you for mentioning my two votes, since I have Laureen 1 and Laureen 2. But I still wouldn't prevail.

Then what we should do as an action item, Jean-Baptiste, is circulate this proposal via Calvin along with his rationale to the full Review Team.

CALVIN BROWNE: Laureen, what I'll also do is I'll do a redline on the Recommendation 24 with the [inaudible] because we also need to adjust the rationale, because the rationale speaks to this as well. And it doesn't make sense if you don't adjust that. So I can adjust that while it's still fresh in my mind, I've been going through it and so forth, and hopefully get that. Well, I better [do stuff] just now, but do that early tomorrow morning.

LAUREEN KAPIN: Yes. I'm wondering where that lives now. Maybe as you say, we join some of that with Recommendation 23 to make sure we have data on

complaints at least about failing to protect sensitive health and financial information. It seems to me that's the approach we should take, because this is a discussion, and part of our report that's worth including even if we don't have this recommendation attached to it, so to speak.

CALVIN BROWNE: Okay. The recommendations as they're written in the report currently is Recommendation 23 followed by 24, and then the rationale for both of them says the lack of publicly available information about whether ICANN Contractual Compliance has received complaints and a lack of common framework to define sensitive information and identify what constitutes reasonable and appropriate security measures make it difficult to assess what impact [inaudible] has had on mitigating risks to the public.

So I could probably tweak that so that it contains some of your concerns and makes a little bit more sense, if you want me to. I can wait. Either way, I'm easy.

LAUREEN KAPIN: Why don't we take it to the plenary?

CALVIN BROWNE: Sure.

LAUREEN KAPIN:	To get their views. And then if it ends up being deleted as you recommend, what I can do actually is take a stab at making sure any key things from the rationale end up incorporated into 23. How does that sound?
CALVIN BROWNE:	That's fine. You can do the work rather than –
LAUREEN KAPIN:	You're happy to have me do that. Okay.
CALVIN BROWNE:	Well, no. Like I said, it was fresh in my mind. But that's fine, you can do it.
LAUREEN KAPIN:	So let's submit this to the plenary. Carlton, is your line working?
CARLTON SAMUELS:	I am online now, Laureen. I just got called by the operator.
LAUREEN KAPIN:	Okay, good.
CARLTON SAMUELS:	Are you hearing me?

LAUREEN KAPIN: Yes, I'm hearing you.

CARLTON SAMUELS: Okay.

LAUREEN KAPIN: So why don't we move on to your revisions of Recommendations 21, 22 and 23? And we already have as an action item, Calvin, to add success measures to Recommendations 17 and 18. And Calvin, once you do that, if you can recirculate that as soon as possible. That way, we can – what I'd like to do since we've already discussed 17 and 18 somewhat is then have those circulated to the subteam, because my sense is we were comfortable with those, as I recall, unless anyone is remembering differently. But let's get –

CALVIN BROWNE: Yes, that's what I remember.

LAUREEN KAPIN: Right, so let's get those circulated, and perhaps we can get approval for those. We can do an e-mail approval for those rather than taking up time in the next subteam call, because I think we've discussed them twice already. So if you circulate them, then we can do this via e-mail and get those to the plenary as well. If you circulate them early, we can

get them on the plenary call next week, not this week's plenary call tomorrow but next week's.

CALVIN BROWNE: Will do it.

LAUREEN KAPIN: Okay. Great. Okay, Carlton, your show.

CARLTON SAMUELS: Okay. Thank you, Laureen. So we're looking at Recommendation 21. If you look at the public comments, my response to them is to see how best I could accommodate the public comments, especially those that raise concerns or were negative. The one on 21 that took center stage was the comment not supporting recommendation that is from the NCSG group. What they were concerned about was the use of the term "abuse." And so I thought if we explained a little bit more in the rationale-related findings, we may actually get them to understand what the context in which the word "abuse" was used in our recommendation.

What you see there was an extended rationale for writing the abuse, and then I added the success indicator, which is ICANN Compliance routinely records in prescribed format. I use the word prescribed format there because I think more work needs to be done in terms of the format that is used to publish ICANN Compliance reporting.

I'm not saying that the format is now inadequate. No, I'm saying that if you add more data to what exists now, we might reach the point where people will be satisfied. So we read prescribed format to mean that ICANN Compliance or the community will eventually decide what the prescribed format will be in terms of success.

You see the rationale there. It took a little time to tell them what we mean by abuse and how we think the clarity of the reporting would be improved. In Recommendation 22 –

LAUREEN KAPIN: Should we take these one at a time, Carlton?

CARLTON SAMUELS: Sure, yes. Maybe we should.

LAUREEN KAPIN: Do we have – I keep asking for this. Do we have a redline up here? because without a redline, no one can see what's different. So I'm really wanting –

CARLTON SAMUELS: That's the redline right there you have up there.

LAUREEN KAPIN: Right, but I can't –

CARLTON SAMUELS: The rationale's finding was –

LAUREEN KAPIN: is so there's –

CARLTON SAMUELS: The rationale's finding was – right, but it was missing.

LAUREEN KAPIN: Okay. I'm sorry. So there's no change to the Recommendation 21 itself. Is that right?

CARLTON SAMUELS: No, none at all. No change to the Recommendation 21.

LAUREEN KAPIN: Okay. So I'm moving past the comments. And then is the rationale – is that all new? There was an original rationale, wasn't there?

CARLTON SAMUELS: No, there wasn't much there to rationale at all.

LAUREEN KAPIN: Okay, so you have –

CARLTON SAMUELS: I read it straight from the document. Yes.

LAUREEN KAPIN: Okay, so – and Jean-Baptiste is putting the – okay.

CARLTON SAMUELS: Yes.

LAUREEN KAPIN: Okay. And we all have independent scrolling. Okay, so I'm scrolling.

CARLTON SAMUELS: Yes.

LAUREEN KAPIN: Okay. Then great, now I can see this more clearly. Okay.

CARLTON SAMUELS: So there's no change to the recommendation. I didn't think there was any change there. If you look at the complaints on the [NCSG,] what I thought was necessarily for a full rationale to be developed for them. And the neutral comment was also the one that required a little bit further elaboration.

LAUREEN KAPIN:	So questions and comments on Carlton's revised rationale for this Recommendation 21. Which has I understand it, Carlton, you based in part on the public comments, and then I think in part on the data and your views of the situation.
CARLTON SAMUELS:	Yes. I started with the one that was negative and simply track what they're saying and then point out where we thought we could clarify for them what we mean by abuse in terms of the ICANN Organization. They wanted clarity as to what we thought they should include in their reporting, and I did that.
LAUREEN KAPIN:	Okay. So Calvin, I see your hand is up.
CALVIN BROWNE:	I just want to understand this, because I think I've got it, but you've added everything that's on the screen that's in red, and you've also added the success indicators which are indicated in blue. Is that correct, Carlton?
CARLTON SAMUELS:	No, the success indicators would be in red also, Calvin, under the header "Success Indicators."
CALVIN BROWNE:	Okay. It's coming up in blue on my screen here.

CARLTON SAMUELS: And [maybe that's all been added, that's all new.]

CALVIN BROWNE: Yes. Okay, got it.

CARLTON SAMUELS: Anything red is what was added.

LAUREEN KAPIN: So I'm going to start off – I like a lot of the rationale, particularly your points about the information lacking granularity and evidence of response to abuse. The parts I'm less comfortable with are comments that don't go back to the data that we have highlighted in our report. And even though they may be based on things that you know, they don't necessarily relate to things that we put as data sources in our report.

The other parts that I think are a little inconsistent in terms of approach are the specific references to public comments. Even though we've responded to public comments in our other recommendation tweaks, we haven't been explicit about, "The GAC said this, ICANN said that, the NCUC said this." And in that regard, your approach is inconsistent with how we've done it for all the other recommendations.

So my suggested tweaks would be – and I didn't have a chance to do this because you circulated this fairly recently, but I'm happy to do this,

would be I would like the opportunity to go through this and make sure that we're sticking to what we actually have relied on as data, and then to sort of reframe some of this to respond to the public comments that you think are valid, but not necessarily reference that, "I'm doing this in response to X and I'm doing that in response to Y."

But in terms of the general gist of this, which is that we need to do a better job and we need to be very precise in how this information is collected, I think that's definitely an improvement. And in terms of the success indicators, when you're saying prescribed format, you're referencing the recommendation itself. Is that right, Carlton?

CARLTON SAMUELS: Yes.

LAUREEN KAPIN: Okay. Yes, so I think that's right. But are there other responses, questions and comments? And Carlton, I'm sorry. I want to give you a chance to respond to what I've said.

CARLTON SAMUELS: No, that's fine, Laureen. I actually expected to get another editor, because the problem in dealing with this earlier on was what the content was. So first, the two little paragraphs, if you notice, they can easily be removed without changing the substantive comment.

EN

LAUREEN KAPIN: Right.

CARLTON SAMUELS: I've put them there deliberately as point as to what I was responding to, if you notice.

LAUREEN KAPIN: That makes sense.

CARLTON SAMUELS: Right. So I fully expect that. But it's [really here merely] as guidance to see what the final paragraph would be.

LAUREEN KAPIN: Okay. Then I'm happy to [inaudible]

CARLTON SAMUELS: There are only really two questions. One, what do we mean by abuse? Two, what is it that we're asking ICANN Compliance to do?

LAUREEN KAPIN: Right. And I think you've done a good job about responding to both those points. So I think the proposed status, at least for my part, would be more cosmetic more than anything else to make sure we're consistent, and then just in terms of protocol that we make sure that our narrative draws from the data we've focused on as a Review Team.

CARLTON SAMUELS: Right.

LAUREEN KAPIN: So I'm happy to circulate some proposed edits for you and the group to consider, and because we've gotten these fairly recently and I've done that myself, circulated things barely before the call, I invite everyone to take a closer look at this, including the other recommendations, and circulate feedback to Carlton this week by Friday so that we can take this up and wrap it up in next week's call, because I see we're approaching the end of the hour. And rather than start something and not finish it, I think we may just end three minutes early. Does that sound like a reasonable plan?

CALVIN BROWNE: I agree.

LAUREEN KAPIN: Okay. So I'm going to thank everyone for participating, and I'm also going to note that we're behind schedule and ask everyone – and I certainly include myself – to try and circulate their work a little bit earlier so that we have a chance to digest it and then can move through it quickly on the call. That would be helpful.

CARLTON SAMUELS: Just before you go, Laureen, the other thing is just to mention that we had – earlier I talked about these recommendations, we thought we could consolidate them. I now believe that we shouldn't consolidate them. We should let them remain separate.

LAUREEN KAPIN: Okay.

CARLTON SAMUELS: And of course, pending the other adjustments that we will make.

LAUREEN KAPIN: Okay. That is good to know. Let's note that in the action items just as one next sentence, that Carlton does not recommend consolidating these recommendations. Just so it's clear.

So I am going to wish everyone a good rest of the week, and we will speak again tomorrow for the plenary call, I'm hoping all of us will, and we will also be having our regular safeguards call scheduled next week as well. So thanks, everyone.

UNIDENTIFIED FEMALE: Thank you.

CALVIN BROWNE: Goodbye.

[END OF TRANSCRIPTION]