

**ICANN
Transcription
Review of all Rights Protection Mechanisms (RPMs) Sub Team for Data
Friday, 06 April 2018 at 16:00 UTC**

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Michelle DeSmyter: Good morning, good afternoon and good evening. Welcome to the Review of All Rights Protection Mechanisms Sub Team for Data call on the 6th of April, 2018. On the call today we have Rebecca Tushnet, Phil Corwin, Michael Graham, Susan Payne and Kathy Kleiman. We have no apologies. From staff we have Julie Hedlund, Mary Wong, Berry Cobb, Ariel Liang, Kim Carlson, Antoinetta Mangiacotti, Andrea Glandon, and myself, Michelle DeSmyter.

As a reminder, please state your name before speaking for recording purposes. And I'll turn the meeting back over to you, Julie Hedlund.

Julie Hedlund: Thank you very much, Michelle. And welcome everyone, thanks for joining. As you may recall, we did cancel last week's meeting and then we did a Doodle poll to see the preference for this – the time for this meeting and this was the preferred time. So thank you for those of you who could join.

And I will maybe just run through what we have on the agenda for today based on the action items from our meeting that took place at ICANN 61. In that meeting we had gotten information from our meeting with Jon Nevett and the action item was to review that information and we do have that in the

notes as well as the transcription that we sent around. And the other action item was relating to the need for our data in relation to the additional marketplace RPMs, the document that you see before you and the decision to start the next meeting with Question 2.

And Question 2, for your reference, is on Page 3 of the document which I have scrolled to, and I hope that's what you'll be seeing as well in your room. But just to go back to the notes for a second, and I'm sorry, I don't have a way to display the – easily display the agenda here so I'll just talk through it. So the discussion would start with Question 2, which is on what information on the aspects of the operation of the TMCH is available and where can it be found? And then timing of next steps and the next steps and timing of future meetings.

Is there anything that anybody would like to add to the agenda for today's call or have any questions about the agenda or changes? And if you need to raise your hand just note there's a little hand symbol that you should see and if you click on that hand symbol then that will raise your hand. Not seeing any hands up so we'll go with that – we'll go with that agenda.

And I guess the other question I have is whether or not you want staff to walk us through this call or if someone else would like to be chair for the day? Not seeing any volunteers. Okay then. Then with no additions to the agenda and it's okay for staff to go ahead and we'll go right to Question 2. And this is, as I said again, it's the third page which I hope you will see displayed right now. And this is in the questions directed to the TMCH providers.

And Question 2 is, "What information on the following aspects of the operation of the TMCH is available and where can it be found?" And so there's two sub bullets there. "A is ancillary services offered by the TMCH which are not mandated by the ICANN RPMs including but not limited to the post 90 days ongoing notification service, and other services in support of registry-specific offerings." And then "B, with whom and under what

arrangements does the TMCH share data and for what non-mandated RPMs purposes?”

Just as a reminder from our meeting at ICANN 61, there was a suggestion that this question could be included with questions to the TMCH along with other questions that Berry is collecting, but there was a note that this question should be rephrased. But there was no discussion of how to rephrase it in the last meeting. So then I will then leave it up to discussion now. How do we want – you know, what do we want to do with this question, do we want to rephrase it and turn the discussion over to you.

Michael, I see that Michael Graham is speaking but I am not hearing you. And also just looking at the attendees I see that Lori has her hand up. Lori, please go ahead.

Lori Schulman: Hi, this is Lori Schulman for the transcript. Yes, I think this question is confusing on a couple of different levels. In terms of what information can be found, that's a singular question. I don't understand the sub and sub parts of this question, it almost seems like it doesn't relate to the actual question. I think this is three separate questions. One is, "What information on the following aspects of the TMCH is available and where it can be found." Are you talking about one, ancillary services, and two, basically a privacy policy? That's what I think this might be asking.

If so, it doesn't follow logically. I would say ancillary services and then maybe have a dropdown of all the possible ancillary services that could be shown and then a space for an "other." I don't know of any others. That's what strikes me as confusing, so number one, you know, "ancillary services including but not limited to," seems to actually answer the question. That's why I think it needs to be rethought.

And I would say ancillary services and leave a menu of services or leave an open box for people to say what services they do advertise. And then, "With

whom and under what arrangements does the TMCH share data and for what non-mandated RPM purposes,” to me that actually sounds like part of a privacy policy question. “With whom and under what arrangements does TMCH share data?” and it would be which data to whom for what purposes? So perhaps it’s more helpful to have a privacy – the question is, “Where is your posted privacy policy? Do you have a privacy policy with whom do you share data when and how? Do you notify registrants when you do?” I mean, registrants with TMCH by the way, not domain registrants. I mean, the registrants inside the TMCH. Thank you.

Julie Hedlund: Thank you, Lori. And Kathy, please go ahead.

Kathy Kleiman: Hey, this is Kathy. I have no problem adding a privacy policy question but I don't think that's what this is. So I think we're asking just kind of broad questions about the TMCH and where the data is available so ancillary services is one. So kind of registry-specific offerings would be ancillary services to the RPMs. But I think B is designed to be you know, who else do you share the data with, not necessarily personal data but data that's in the TMCH database and for what non-mandated RPM purposes?

So this wouldn't be ancillary services, this would be kind of third party services. But again, if Lori wants to add, you know, a data privacy question as well, no objection. Sounds good to me. We're asking lots of those questions these days. Thanks.

Julie Hedlund: Thank you very much, Kathy. And I also – I see that Michael's hand is up then Lori and then Susan, they're not necessarily showing up in any particular order but that's the order I saw them, Michael, Lori, Susan. Please, Michael.

Michael Graham: Yes, can you hear me?

Julie Hedlund: Yes, fine.

Michael Graham: Oh great. Yes, I've sort of been troubled by the question and I guess what it is it looks like we've somehow combined two. One is asking about, which would go back to the TMCH, what information do you have that's available and where can we find it? But then really A and B are the questions that we want to ask that that information would be connected with. One would be connected with ancillary services that aren't mandated by the RPMs, you know, I guess the question is what are – of these services are being offered by the Trademark Clearinghouse.

And then the second which I think actually is two questions. One, "With whom and under what arrangements does the TMCH share data?" And then, "Under what circumstances does the TMCH data share for non..." or do you force that listed under A, "non-mandated RPM purposes?" So it seems like we would do well to re-figure this question and that they're actually two if not three questions within it and the first statement under Question 2 is, how can we find the information to answer these two questions? Thanks.

Julie Hedlund: Thank you, Michael. Lori, please.

Lori Schulman: Yes, hi. This is Lori. I'm responding to a comment Kathy made when it says, "With whom and under what arrangements does the TMCH share data and for what non-mandated RPM purposes?" I still think that's overly broad. I still think it's a kitchen sink kind of question. And I'm wondering if there's just a scenario that we're trying to get from this and I throw that back to Kathy, if there's a particular scenario that you're thinking of or if it's not and you are trying to figure out what are they doing and we don't know, I might want to actually, again, see these pulled out as a completely separate question and elucidated more carefully.

You know, are you receiving other requests, are you responding to requests? If so, you know, what are you doing? As opposed to just generally say, "share data" because I think that's super, super broad.

Julie Hedlund: Thank you, Lori. Susan, please.

Susan Payne: Yes, sorry. Is my mic live?

Julie Hedlund: Yes it is.

Susan Payne: Oh good, sorry. I forgot to mute it from the start. Yes, sorry, well apologies that I hadn't really done this beforehand but I – while people were talking I was just looking back at the transcript from Puerto Rico. And I think what we concluded when we talked about this was that this question is about the – is about the, you know, what do we not know about. Because we already know that there's the post 90 day ongoing service. And so what we were really thinking was, you know, is there – is there any other – you know, is the TMCH offering any other service where it's using specifically the data submitted for the purposes of the RPMs, which, you know, which we haven't already asked you about and we perhaps aren't aware about.

And we – but we also talked about the fact that we'd obviously previously asked the TMCH providers a number of questions and that we should remind ourselves of what we've already asked them to make sure we didn't ask them again. And I think we also thought that perhaps we needed to look at what their Ts and Cs say. So for example we're proposing here to ask them the question about the post 90 days ongoing notification service, but we may not need to ask them anything about that because if we read their Ts and Cs it may – it may answer the questions, you know, it may give us everything we need to know.

But I don't – I'm sorry to say I don't think – I don't think we've done any of that exercise and so perhaps that's that we need to do. And then we can recraft these questions – or this question if we then know what it is we, you know, what it is we're missing.

Julie Hedlund: Thank you, Susan. Any further comments on this? And thank you so much for going back to look at the transcript. Oh I see Kathy's hand is up. Please, Kathy.

Kathy Kleiman: Yes, a general question, not for right now but for later, and sorry if I missed it, I came on a few minutes late. But, you know, if we could get an update, Julie, on what's happening with the survey provider, that would be great because that'll give us some sense of our timing as well.

Regarding when we talk to the TMCH provider in the past, and the questions, my recollection is that we were talking about operation of the TMCH database, what goes in, what doesn't go in and why. Now these questions are kind of broader on the use of the TMCH Clearinghouse data and services kind of – that's why we're in the ancillary area.

So I think we really zeroed in because I remember the Copenhagen meeting you know, when they were there and we were talking and the questions about design marks and other things, we were talking about what's in the scope of the TMCH database, now we're talking about how it's being used more generally. So I don't think we've covered this, I could be wrong, but I don't have any recollection of covering it.

And I like the way Susan rephrased the question kind of clarifying it for the question that's now 2B kind of, you know, is the TMCH offering any other services using the RPM data, that sounds like fine rephrasing. Thanks.

Julie Hedlund: Thank you very much, Kathy. And I just wanted to – oh, Susan you have your hand up. Please go ahead.

Susan Payne: Yes, thank you. Yes, it was just a couple of things. I think it would be marvelous to have the update on the data survey that Kathy mentioned, absolutely. Although of course it doesn't really impact on what we do with this particular question because of course that survey isn't asking any questions

of the TMCH providers, I don't think, I'm pretty sure it isn't. So it doesn't give us a kind of timeline in that sense.

But I mean, absolutely agree it would be great to know what the current is. Other than that I'm seeing lots of comments from Mary but I'm not sure if I'm understanding them correctly. Mary, are you saying that we've – we did already ask this question once to the TMCH provider and they'd already responded to it? I'm just not sure if I'm understanding you correct. Oh, no she's saying we haven't asked. Okay.

Julie Hedlund: Thank you. Thank you, Susan. And, yes, just to call out for the transcript and recording as well, Mary's comment is that, you know, essentially these were questions that were drafted and reviewed previously. So you know, it's a little – staff is a little concerned that we're now redrafting them rather than focusing on whether we already have or can get the information from Deloitte, you know, and since these questions were actually confirmed and settled at one point by the full working group.

And although, as she notes, clarifying the intent of the questions may be helpful to Deloitte. And no, they have not been asked yet. But I think that's the gist of it.

I see two hands up. I see Kathy and Lori. Kathy, please.

Kathy Kleiman: Sorry, I didn't take it down. I'll try to figure out how to do that. Thanks.

Julie Hedlund: You can – for everybody's reference, just click on the hand again and it should go away. And you got it, thank you. Lori, please go ahead.

Lori Schulman: Yes, I agree with Mary's point about not redoing work if we don't have to, but at the same time, I think what's happening is for some of us this has been a week or so or more since we've seen the questions and when you look at them on second look, what if we do find things that need a little bit of

clarification, I feel like – I don't feel like we should necessarily be tied to – well these are exactly set in stone because they were given conceptually. These aren't the questions as they're going to appear on the surveys, are they, or not? Like I guess I'm confused because on one hand I understand it's important to stick to what the group decided, I'm a huge proponent of that and I'm not asking that we reverse that.

But at the same time if we find things that we think may not be clear and we need to clarify them, as long as they're not changing an overall intent would that be acceptable? I mean, I'd ask the people on the call. Otherwise to be honest, I would rather than just not review the questions and just submit them. And if there's a lack of clarity the providers can come back and say, what do you think – what do you want?

Julie Hedlund: Thanks, Lori. And this is Julie Hedlund from staff. Just to go to your point about the survey, so the survey that was developed does not cover these questions or the TMCH providers or provider in this case really, just to be clear on that. So but these are of course questions that we could ask of the TMCH provider that we have not asked them. And, you know, if they do need to be clarified we can talk about that but just to make that point clear. And Susan, I see you have your hand up. Please go ahead.

Susan Payne: Thank you. I couldn't tell if I had my hand up or not. It's really confusing. I wish it changed color. Yes, so I was – I just wanted to respond to I guess it's the summary you gave us Mary's comments and that was really helpful and it helped me kind of get my head around it. And so really what we're – what we're here for is to look at this question and see where we can find this data. And I think – so I think for a lot of it, you know, we can look on the TMCH providers Website and, you know, we can look at their Ts and Cs and we can, you know, determine what services they're offering and we can see what they're, you know, what information is available and, you know, and we can find it.

So I'm not sure that we need to ask them anything unless we go on there and we discover that there isn't, you know, that the information they're providing isn't clear and we can't understand it. Maybe we don't have a question for them. And then I guess I'm – perhaps I am somewhat agreeing with Lori as well, you know, if we find that there is a question we need to ask them then probably we should submit the full question, Question 2, but we say to them, you know, we found the answers to X, Y and Z so we're really, you know, hoping you can focus on, you know, on Part B or whatever it is that we want them to focus on.

Julie Hedlund: All right well thanks so much, Susan. That's very helpful. And I just wanted to note Ariel from staff actually did have her hand up, she wasn't able to get it raised. So if you don't mind – and that relates to the survey, if I could go to Ariel and then Kathy, I'll come to you. Please go ahead, Ariel.

Ariel Liang: Thanks, Julie. This is Ariel from staff. So just to provide a very brief update on the survey process, we're in process evaluating the proposal submitted by the participating vendors and the procurement team of ICANN is managing on leading that process. So we're just following the rules and the timeline set in the project. So we will keep the sub team updated if we have additional information but that's pretty much to the update now.

And then also just follow up on what Julie said earlier, the – when we submitted the survey – the project overview of the vendors to reveal we did include two questions from the additional marketplace RPMs document that's the Question 4 and 5 but not Question 2, so just want to clarify that. Thank you.

Julie Hedlund: Thank you, Ariel. And I'll just note I think we didn't include Question 2 because we didn't feel that it was in the scope of the survey and we did have to stay within the scope of – the original scope of the survey. Is that right, Ariel?

Ariel Liang: Yes, that's what the sub team has agreed on and decided on.

Julie Hedlund: Great, thanks. And Kathy, please go ahead.

Kathy Kleiman: Actually before my comment a question for Ariel, can we – do we have any idea – can you provide some background on how many groups have expressed interest and when we're closing all this up, you know, when the final survey provider will be chosen.

Ariel Liang: This is Ariel. Thank you for the question. I also noted the question from Phil too. So the procurement guideline doesn't allow us to reveal that information, that is confidential process and it has be ICANN who deal with the vendors and we cannot let you know about that so – but I will check with the procurement team about what other information we can let you know so then we can follow up on that because we're still in process of evaluating and engaging with the vendors so that – the guidelines don't allow us to let you know how many have submitted proposals. And also the date is also pending at the moment because we're still in the process of engaging with the vendors.

Kathy Kleiman: Okay, and Ariel, or Julie, did you guys that say the Questions 4 and 5 which I would think are to TMCH providers but since they're not on the screen in front of us I'm not sure, are already part of the survey or 4 and 5 were to another group that we're already surveying?

Ariel Liang: This is Ariel. So I just wanted to clarify on that, the Question 4 is the one on Page 2 that's included in the appendix document, that's basically the data table that the sub team has worked on so that's included in that table. And then 5 is the one on Page 2 and Page 3 on the top, so these are also included in that data table that we...

((Crosstalk))

Kathy Kleiman: Sorry. Who are they directed to? I can't see those questions or those pages.

Ariel Liang: That was the table that the sub team has been working on since last year so I can take a look at that data table and put the information in the chat.

Julie Hedlund: And actually I've gone back – this is Julie Hedlund from staff – I've gone back a page, Kathy, so that you can see.

Kathy Kleiman: Right.

Julie Hedlund: These were questions to trademark owners.

Kathy Kleiman: Okay, and it looks like Question 5 may be registry operators.

Julie Hedlund: Let me see. For registrars who operated an extended trademark claims service, what has been their experience in exact matches. So...

((Crosstalk))

Kathy Kleiman: ...so groups we're already surveying. Makes sense.

Julie Hedlund: Yes, so in scope, in scope of the survey.

Kathy Kleiman: Okay. So now I'll make my comment unless anyone else wants to ask another, you know, some more procedural questions. And thanks for the background, Ariel and Julie.

Julie Hedlund: Please go ahead, Kathy.

Kathy Kleiman: Okay. So questions – Question 2, A and B, you know, I think the working group has asked us to come up with an answer to this, and I'm not sure we're going to see it on public places, but the TMCH provider has said, you know, they've been very receptive to answering questions. And I think we should

ask them this because I'm not, you know, some of the ancillary services may be available online, some of them may not. But certainly kind of that catch all that Susan described for B, you know, may or may not be publicly available or may or may not be, you know, on a webpage that we would know to look for. So I think these are good questions, the working group's endorsed them and we should just send them, you know, we could send them on through staff. And my guess is they won't have any problem providing with us a timely response. Thanks.

Julie Hedlund: Thanks so much, Kathy. And just noting again back to Susan's point that I think we can safely say that the question on – that A on – the sub question A is something that we would be able to find on the Website and, you know, and we can certainly look there first but noting that I don't think anybody has argued against sending questions to the TMCH provider and as you noted, they've been willing to answer questions as well.

So are there any other comments on Question 2? And if not, I guess I would ask what – with respect to Question 2, what we should capture as action items? We've had some discussion here about doing a little redrafting but also discussion about looking at information that we can get, you know, that's already available and then also collecting this as a question for the TMCH provider for Deloitte. So those are the things that we heard as staff. Have I missed anything? Does anybody have anything else they want us to capture for this question?

Not seeing anything in the chat. I'm not seeing any hands up. So we'll then go ahead with that and move to the next question which is Question 6. "What role does the TMCH provider frontend play in servicing the additional marketplace RPMs? For example, what services do you provide to ICANN registry operators? Does the TMCH use any data from the Clearinghouse to provide these services? If so, please explain. How are you compensated for the provision of these services?"

And there's a staff note relating to this question and I think actually to both Question 2 and 6 that some of the materials noted above, e.g., the TMCH guidelines requirements and functional specifications, may provide information relevant to answering this question. Fuller answers can be obtained through direct outreach to and contact with the TMCH providers. So I think that gets to two of the things that we had just mentioned here about looking for available information as well as asking the providers.

So let me stop there with Question 6 and see if there are any comments or discussion. And I'm not seeing any hands. Are there any – any – oh, thank you for rescuing me, Susan. Please go ahead.

Susan Payne: Sorry. Yes, I was going to say in relation to probably the first two bullets that I think we kind of covered that when we were talking with Jon – Jon Nevett – in where – Puerto Rico. And so I was going to say I wonder if still need to ask this. But then I was thinking that of course that's only one registry operator. You know, well we have, you know, the benefit of Jon being with us. But I suppose, you know, it is possible that there are, you know, we know that there are a few other registry operators who also provide something like a DPML and again there might be some kind of other services that, again, that we know about. So I suppose it's, you know, it's a kind of reasonable question to ask.

But I do think – I think again when we're asking, I mean, we're clearly not asking about what services do they provide to registry operators that we already know about because they're mandated by the rules. I'm assuming that's right. You know, we're asking about something that isn't – that's outside of that. So I think if we're sending this to them we just need to be clear in our kind of covering note that we're not asking them about, you know, about the normal sunrise and claims service that we all know about and we've spent so much time talking to them about anyway. We're asking about what else do you do that we maybe don't know about.

Julie Hedlund: So thank you, Susan. This is Julie Hedlund again from staff. I'll just note something that Mary had asked in the chat, and then there's another comment as well. She asks – I can pull it – go back to it – “@Susan, isn't Donuts the only registry operator right now that provides additional marketplace RPMs?” And then, “Besides Deloitte, not a registry operator but as the TMCH provider, that is since Deloitte now runs the MMX ones.”

Susan Payne: I was going to put my hand up.

Julie Hedlund: Yes, please go ahead.

Susan Payne: Thank you, Mary, I think you are correct. Yes, thank you for reminding me. So in that sense maybe we have the information we need, although there still is always that kind of what don't we know about, you know, are you doing something we don't know about. But yes, thank you for the reminder.

Julie Hedlund: Thank you, Susan. And thank you, Mary. And just noting too that yes, we did have – we did ask this question of Jon Nevett, but I don't think we've asked this question of Deloitte. So again, we could tee this up as a question for Deloitte so we can get their point of view as well to be more complete.

And so again, Julie Hedlund from staff. Just – and Susan Payne says, “Yes, sounds good.” This is the end of the document, so I believe we have gone through all of the document and all of the questions unless – but what we haven't done, I'm sorry, and I will then bring this up. The last thing we need to do is the overarching question, Question 1. So going back up to the first page, Question 1 asks, “How and to what extent does use of protected marks lists, e.g. blocking services, affect the utilization of other RPMs especially sunrise registrations?” And the staff note associated with that is that, “The sub team identified this question as the overarching issue on the topic of additional marketplace RPMs. It is anticipated that the working group will deliberate on this question following receipt and review of input on the other questions.

So actually, we - based on it seems here that we cannot address this question until we have answers to the other questions. But I'm not sure if I'm correct in that. Susan, please go ahead.

Susan Payne: Thank you. Yes I put my hand up to say that and then was just about to take it down because I felt like I didn't need to. And indeed again that's something that we touched on right at the end of the meeting we had in Puerto Rico and acknowledged that point that we felt that Question 1 was kind of the question that we as a working group are asking ourselves, which we can't deal with until we've got the answers to the other questions.

Julie Hedlund: Well thank you, Susan, that's really helpful. So I think then as – I think we are done for now, I think is what this says here until we have to meet with the survey provider in May or June. But I do think that staff can be helpful in pulling together all of the results of all of our discussions on these questions and noting any actions so that we can do a summary document and know exactly what it is that, you know, we might want to do, you know, a couple of these questions as we noted were included in the survey, a number of them have asked – we've asked Jon Nevett about. And some of them we then indicated would be useful to be asked of Deloitte and then there's also some research that staff can do as far as what's available on the site, the Website as well.

So I'll suggest then that staff can take the task of pulling together all of the actions relating to these questions, pulling together the input that we have from Jon Nevett, which we do have in the notes from last time but putting it a little more formally together and then pulling out the various action items.

Does anybody have any further comments or questions that they would like to make on this document or on the suggested way forward? And I'm not seeing any hands up. Oh, there is a hand. Kathy, please go ahead.

Kathy Kleiman: Hi, Julie. I just wanted to say that we've been meeting for a long time on Friday mornings at least Eastern Time. This has been an incredible effort of this sub team, an incredible extended effort and for my part wanted to say thank you to everyone. It's – we've done a lot of work and at some point we'll let the working group know, but it's incredible, it's really enabled us as a working group I think to move forward and hopefully get the data we need to make the policy decisions we'll be making. So my thanks and applause to everyone.

Julie Hedlund: Well thank you, Kathy. And thank you all. And I see Michael has his hand up. Please go ahead, Michael.

Michael Graham: Yes, just really quick, I want to echo what Kathy just said. And at the same time I wanted to ask very quickly because I think I missed it in terms of the timing for the RFP being accepted and moving forward on the survey, that we're looking at May June on that?

Julie Hedlund: I'm sorry, I'm – for some reason I missed the last bit of your question. I'm sorry to make you have to repeat it.

Michael Graham: No, it was just asking the timing on the RFP and having the survey actually conducted, what we were looking for on that.

Julie Hedlund: Right, exactly. Ariel, do you want to speak to the timing? I don't recall off the top of my head of the RFP and...

((Crosstalk))

Ariel Liang: Yes, this is Ariel speaking. So yes, the answer to your question, Michael, is yes, we're targeting May June and so we're targeting to get the vendor contracted in May and then start the engagement with the sub team as soon as that's done, so we're doing our best to meet our target timeline and we will keep the sub team apprised with the progress.

Julie Hedlund: Thank you so much, Ariel.

Michael Graham: Thank you, Ariel.

Julie Hedlund: That answer your question, Michael?

Michael Graham: Yes it did. Thanks.

Julie Hedlund: Thank you. Does anybody else have any other questions or comments they would like to make before we close the call? I see we do have in the chat from Mary, "Following confirmation of the vendor we'll engage quickly with the sub team to finalize the survey questions which the full working group will hopefully also quickly agree with so we can send it out." Thank you, Mary.

So I'm not seeing any other hands raised and not seeing any other things to raise in the chat. So thank you, again, everyone, and for joining these many past Fridays and we hope you have a good rest of your day and a nice weekend. And we'll reengage when we get to the next step. And as noted, again, staff will send out a summary, we'll send some notes from this call and also a summary of action items and where we stand. Thanks again.

Susan Payne: Thank you.

Julie Hedlund: Thanks, everyone, then and this call will be adjourned. Bye-bye.

Michelle DeSmyter: Thanks so much, Julie. Operator, please stop the recordings for us and disconnect all remaining lines. Have a great day, everyone.

END