PANAMA – High Interest Session: RDS-WHOIS2 Review
Thursday, June 28, 2018 – 17:00 to 18:30 EST
ICANN62 | Panama City, Panama

ALAN GREENBERG: I'd like to welcome you to the RDS-WHOIS2 review team reporting session. My name is Alan Greenberg. I am the chair of the review team. And I have with me on the panel a number of our members plus Susan Kawaguchi who's also one of the vice chairs.

If we could have the first slide. There we go. Thank you very much.

Pushing the button is supposed to make it advance but it doesn't seem to work.

UNKNOWN SPEAKER: Try again.

ALAN GREENBERG: Perfect. Thank you very much. What we have planned is a whirlwind, very fast review of essentially the items that we have been looking at in the review team. The review team convened about eight months ago. We'll look at the time line in some detail. And we'll be looking at the items that we've been looking at, understand, try to present the objectives, the methodology,

and a summary of what our findings are in each of the areas and whether we are going to be making any recommendations.

We hope to be able to finish the presentation in about the first half of the session and leave half of it for questions and answers.

The review team is made up of 11 people, so it's a moderately lean review team. And with representation from the ALAC, the GAC, and the GNSO and the ICANN Board, the other parts of the organization decided not to participate in this review, which partially explains the small size of the team.

So we're going a little bit ahead of ourselves.

I thought there were different slides. No, okay.

So there are a number of issues that were either -- are either in the bylaws for the first item or were suggested by the community as we proceeded that we have decided not to look at. But these slides seem out of order. Excuse me while I go through them because there are three slides that don't seem to be in there.

ERIKA MANN: You lost some slides?

ALAN GREENBERG: There seems to be some missing. All right. Luckily, I have copies in front of me.

Maybe I'll skip ahead and see somehow -- I don't know how they could have gotten out of order. Okay. I have now finished half the presentation.

Okay. There are slides missing. So we're going to just wing it. I hope the presentation is linked to the session.

Excuse me while I put my glasses on.

The objectives of the review were to assess -- the essential -- essentially the overall review is assess the effect of the implementation of WHOIS recommendations and to evaluate to what extent, that is, the WHOIS1 recommendations, and evaluate to what extent they were implemented and how effective they were being. So the first review team created a number of recommendations, and our first task is to see did ICANN follow the recommendations of the first review team.

We looked at all of the changes to WHOIS and there have been a significant number of changes largely associated with PDPs and other actions since the last WHOIS review team convened. And we were tasked with evaluating essentially to what extent did these other changes impact the effectiveness of WHOIS and do we need to make any recommendations on those?

There are a number of issues that were -- are both in the bylaws, in the original Affirmation of Commitments review and in the new bylaws because the review was transferred into the bylaws with the -- when the accountability changes were made. And we were asked to assess whether the legitimate needs of law enforcement are being met by WHOIS; whether it promotes consumer trust and a new one that was added in the bylaws, whether it safeguards registrant data.

We looked carefully at what was required and we also added one or two things. That is on slide 7. And that is slide 7.

SUSAN KAWAGUCHI: This is my slide 7.

ALAN GREENBERG: Why don't you turn your machine around to show them what they missed.

[Laughter]

One of the items we decided to add for ourselves was to assess whether contractual compliance is operating -- I'm sorry. I'm having trouble reading my own writing with my glasses -- to assess the effectiveness and transparency of ICANN's enforcement of existing policy through contractual compliance.

And the last item is one we haven't done yet, is the bylaws give us the right to recommend to the Board to change the bylaw. That is, if we find things in the bylaw that we think don't make sense to us and shouldn't be done in the future, then we have -- we can make a recommendation. That's something we're going to be doing towards the end.

SUSAN KAWAGUCHI: Just had to wait for it to load.

ALAN GREENBERG: Maybe we should this session over again.

UNKNOWN SPEAKER: Just go on.

ALAN GREENBERG: I'm trying and now my zapper doesn't work anymore. It's the last day. Okay. How about we don't use the zapper and I'll say "next slide, please." And I have some +1s from the staff at the back of the room.

All right. There are a number of things we decided not to do. One of them is in the bylaws. The other ones are issues that were suggested by the community when we started the review. One of -- the one in the bylaws, that we should review the OECD

guidelines on data privacy and data transport. And we decided not to do that for a number of reasons.

First of all, the guidelines are somewhat outdated at this point. We were already starting the saga of GDPR, and we knew that to a large extent ICANN didn't obey any of these and things were going to be changing. So it seemed like a rather useless exercise to go through that process since it wouldn't really be -- result in any effective recommendations that we could make.

It was also suggested along the way that we review the RDAP protocol, the existing WHOIS protocol, do a comprehensive review of how GDPR is going to impact us, and review the GDPR implementation.

The first two did not seem to be practical. Again, the existing WHOIS protocol, it's going to go. The RDAP protocol is one developed by the IETF and we didn't consider that we were experts in that area to evaluate a protocol in any case. And the last items again were -- GDPR was something that was going to be in flux for pretty much the whole range of our review team. And it didn't seem to be a practical thing to do at that point.

Next slide, please.

We were trying to follow best practices in what we're doing, so everything we're doing is open. All of our mailing lists are open.

All of our meetings are open. Anyone can watch and submit questions or things like that.

We are trying to do everything by consensus, minimize the amount of voting or even poll taking that we're doing. We are trying to do this as a fact-based basis. So we've had lots of briefings, lots of input from ICANN Org. And we are -- we are doing our best or will be doing our best to formulate recommendations that we think will improve the situation and be implementable and measurable.

Next slide.

That's a list, simply our laundry list. The first items on it are recommendations out of the first WHOIS review team, and there were 16 recommendations. We divided them into groups and assigned them to subgroups within the overall review team. Each subgroup has a rapporteur and somewhere between two and four other members. And having tasked with doing the analysis, doing the initial -- producing the initial report and then passing it by the review team, we are now just at the stage where most of the draft reports have been formulated. And the review team is -- the overall review team is just starting to process them and look at them.

Next slide. Next slide, please.

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We have a lot of titles that we're skipping over. They do have URLs that are interesting in them if you want to look at this afterwards.

Just in brief summary, the review team was put together in June. We had our first meeting, face-to-face meeting, in October. We met again in April. And we will be meeting again in the end of July. We are intent, and we believe we'll make it, is at that meeting we will pretty well finalize our draft report in terms of content -- we'll take a little bit of time to get it physically in shape -- but including most of our recommendations and put that out for public comment.

Public comment will terminate -- will run from August and September, terminate in October, just a little bit before the Barcelona meeting. We are planning -- we hope to have at least done our initial analysis of the comments, and we will be looking to meet with members of the community and perhaps a public session -- we haven't really discussed it -- in Barcelona. And our intent is to deliver the final report pretty close to the end of the year. Next slide.

Just a note, what you're seeing is a work in progress. We'll try to note along the way where we think we have consensus, where we don't have consensus. We'll also note along the way some

errors we found in the report just as we're reviewing the slides. So this is very much a work in progress.

Next slide, please.

And the first part -- first recommendation is WHOIS1, strategic priority. And Carlton Samuels will be taking that one.

CARLTON SAMUELS: Thank you, Alan.

I'm doing this for Cathrin Bauer-Bulst who is the rapporteur for this subgroup. Looking at the strategic priority, the recommendation from the first WHOIS subteam you see in the slide there in front of you, first one, it should be strategic priority for ICANN, the organization. It should form the basis for staff incentivization along with the CEO's and the Organization's objectives and the strategic plan. And the Board should create a committee that includes the CEO to be responsible for prioritizing and the key actions associated with the WHOIS implementation.

The committee of the Board should be responsible for the implementation, fulfillment of the data accuracy objectives and monitoring and compliance in keeping with the recommendations. And of course they should issue frequent updates on the progress towards implementation.

Next slide.

So the subgroup reviewed the recommendations and looked at the implementation along with the recommendations, and we made some findings.

The findings were that the organization, the Board have clearly taken a number of steps towards implementation of the recommendations. And the creation of the Board working group is one main area. And there is a lot of actions recorded, and especially in compliance with the accuracy. We feel that the information that is available to us for the recommendation with terms of data protection is simply not enough for us to make any major recommendations there.

Next slide.

Based on the analysis of the data and the outcomes, we thought that the WHOIS1 recommendation was only partially implemented because the implementation largely remained unfulfilled in terms of monitoring the improvements to WHOIS.

We also found that the Board working group got off to a late start, and maybe that was one way that the monitoring and the recommendations did not follow the recommendations of the first WHOIS team.

We feel that the -- there's some -- while there was some evidence and some progress, they were still a little off in terms of making it a truly strategic priority because we didn't see advanced planning for the issues. And one instance, of course, is the current situation with GDPR.

So to address these issues, the subgroup drafted the following recommendations.

Go to the recommendation slide, please, which is three slides down.

Draft recommendation: The ICANN Board should update the charter of its Board working group on RDS to include forward-looking planning based on a regular assessment of the RDS's fitness to meet legal requirements and legitimate user needs as outlined in the bylaws. And this is just a placeholder. The subgroup that is actually met, and we still don't have consensus on this recommendation.

ALAN GREENBERG: If we could interrupt. It's slide 18 we want to be on right now.

CARLTON SAMUELS: Yeah, so there's recommendation. As I was saying, it is not fully implemented because -- decided, because the consensus is still not in the subgroup that looked at the strategic priority.

Can I just go on now to the recommendation 2?

ALAN GREENBERG: Yep. Carlton will handle it.

I think we're going to have to pick up the speed a little bit or we're going to be here all night.

CARLTON SAMUELS: Recommendation 2. This one has to do with the single WHOIS policy and that subgroup and the rapporteur for that subgroup. Can I look at the slide there?   It tells you what the recommendation was. The Board should oversee creation of a single WHOIS policy document, and reference it in all agreements with the contracted parties. And it should be the place to have documented all of the current WHOIS policies, both in terms of the contracts, existing contract, as well as in the GNSO consensus policies and procedure.

The finding of the subgroup, we do have a web page that contains all of the WHOIS data. This is a micro site that is available for that. The web page we believe is a good constitute

for the single document, as was defined in the recommendation. And we believe that the Board initiated PDP, the RDS PDP that has been sequestered or failed, that was put in place to address the next generation PDP is a good indication that the Board was making a single -- making some effort to have a single WHOIS policy implemented.

Next slide.

So the finding is that we have agreed that the recommendations number 2, single WHOIS policy, is fully implemented. We would just recommend that the page contents and the formats on the website itself could do with some work to improve both the content as well as the navigational aspects of the board. The next thing is the three-phase process, framework that we see the Board initiated in terms of the RDS PDP that failed. We feel that that is a good -- that's a good program to achieve a single WHOIS policy, and we feel that once it is merged, we will have a comprehensive WHOIS policy. And the recommendation you see there is that the -- we are reviewing that recommendation because of what's happening with the GDPR.

Thank you.

ALAN GREENBERG: Thank you, Carlton.

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The next one is mine, and the slide that it's on is the correct one right now.

Recommendation 3 was outreach. The recommendation was a relatively short one.

Something is whispering in my -- Carlton, do you want to turn off your microphone?

Sorry.

I was talking but Carlton's microphone was on.

The recommendation was relatively short. ICANN should ensure that WHOIS policy issues are accompanied by cross-community outreach, including outreach to the communities outside of ICANN with a specific interest in the issues, and an ongoing program for consumer awareness.

The group looked at all of the documentation on the web and other documentation available, and there is a huge amount. The main component of the implementation was to design a new WHOIS information portal that we found was very well implemented. A little bit of problem navigating it, but other than that is correct the material was at a reasonable level and, in fact, matched a number of different levels depending on how you approached it, and was very effective.

Unfortunately, we also found there was a lot of other information about WHOIS on the ICANN website, including some really nice videos and tutorials which predated the WHOIS portal and did not necessarily match it. So although the WHOIS portal, for instance, implemented a query facility, if you went to another place on the ICANN website, they would tell you, no, don't use that -- well, they didn't say don't use it. They would say use another one, which was a decade older and not nearly as complete or user friendly, and the previous information had not been up -- had not been upgraded. So there were certainly a number of things like that.

Next slide, please.

This is one of the typos I mentioned. No, next. The slide number we want is number 24. Correct. No. Yes, now it's correct.

The information providing parts of the recommendation were -- we found to be fully implemented. The part that was not implemented in our view was outreach to parts of the community not normally associated with ICANN. An example, data commissioners. One has to hypothesize what might have happened if we spent five years educating the data commissioners on WHOIS over the last five years, but...

So overall, it has been implemented with the exception of specific non-ICANN outreach.

Next slide, please.

We have two recommendations, one that is all of the information related to WHOIS and associated registrant information. From our perspective, WHOIS is a very unique subject and, you know, must be covered well, but from a registrant's point of view, it's only one component of the overall information they have to deal with. So we are recommending that essentially all registrant data be revised to be made consistent and to reflect the reality at that time.

We do note, however, that it should not be done until our GDPR implementation is somewhat stabilized. There's no point in trying to document the things that are in flux at the moment, but once things are stabilized, there does need to be a complete revision. Some of it may not change but it all needs to be integrated and work well together.

The second recommendation addresses the part of outreach to other parts of the community. We don't know exactly what WHOIS is going to look like two years from now. There may well be very little information available. If there's very little information available to people, there's no point in telling them to look at it.

So we feel that ICANN needs to do a careful evaluation, including members of the community, not just internal, to review what can be accessed, how to access it, how to get -- perhaps how to be accredited to access it in our new world, and consider to what extent they need to do outreach to nontraditional parts of the community.

Examples might be law enforcement, consumer protection agencies, or, for that matter, registrants themselves to tell people -- tell them how their data might be used, which is an important aspect in the post GDPR world.

And that one I believe finishes recommendation 3.

Recommendation 4 on compliance is -- goes to Susan Kawaguchi who is one of the vice chairs of the group.

I'll note that for -- it didn't make a lot of sense to have two groups working on compliance, one working on the WHOIS1 implementation and the other on new issues. So the subgroups were merged, and what you'll see is a composite of both the evaluation of the previous one plus new things we're looking at.

Susan.

SUSAN KAWAGUCHI: Thank you, Alan.

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So we reviewed the WHOIS1 recommendation number 4, which basically -- and you can see it written there -- is -- it talks about best practice principles, full transparency, resourcing, structure, annual reports, and appointing a senior executive whose sole responsibility would be to oversee and manage ICANN's compliance function and reporting to a Board committee.

And then as Alan stated, that we took a look at the -- what's happened since, and we had, you know, an objective for that.

Can you go to the next slide, 28, please.

So with the WHOIS1 recommendation, we found that the Compliance Team has made significant progress in reporting metrics and data in their annual report. They have comprehensive reports that they publish on time. And it appears that the Compliance Team has all the necessary resources to manage compliance activities. Personally, I was on the WHOIS Review Team 1, and I can -- I definitely could see that the Compliance Team had grown significantly since 2012 when that report was published.

But there is no indication that the recommended reporting structure was implemented. So the reporting structure, the intention of the WHOIS1 recommendation was to ensure the role had the independence needed to perform the compliance

function without restriction from the rest of the organization. We do not see that, but we're still looking into that.

So the subgroup further identified other issues. Whether or not it's feasible to adhere to the intentions of the WHOIS1 reporting structure. We did have a little bit of a discussion about whether or not an ICANN Org employee can report to a Board committee. So -- And there were a few things in the WHOIS inaccuracy report data that was not clear, and that the Compliance Team does not utilize available information for proactive assessment and enforcement.

So a few -- a few -- let's go to slide 29. A few just key points. And in this -- for this review, we did not review the latest ARS report. It just came out a few weeks ago, and so this review does not include that. So some of these stats could change, but you can see on the first one, it seems to be there's a lot of ARS tickets are created, and then they're closed before a first notice was sent out. We're not sure exactly why on that.

And 40% of the WHOIS ARS domain names that are sampled are grandfathered domain names and are not required to adhere to the 2013 RAA. So this doesn't relate to whether or not the registrar has signed on to the 2013 RAA. And so we still have a large number of gTLDs, legacy gTLDs that are not complying to the same requirements. And so just to speed it up here, the bulk

submission tool only has -- only ten users are approved, and it seemed like only three actually used it. That might be more -- If there was outreach on that, there might be more use of that. And once again, the Compliance Team does little in proactive actions.

And there is at least one new policy, the consistent labeling and display policy. There are no statistics we could gather from the Compliance Team on that.

So let's go to slide 30. Let's make sure we're on the same page.

We also found issues with suspended and domain names that the WHOIS record will -- these are domain names that are suspended due to inaccurate data. Sometimes the registrant chooses not to fix that data, and the domain name is suspended. That inaccurate data resides in the WHOIS record for a long period of time and may or may not be re- -- unsuspended at any moment. So we're concerned about that.

And of those 40% of domain names that were registered and grandfathered in, what -- the grandfathering does not require that all the registrant field data is collected. And that dates back to the 2009 RAA, and that could be problematic.

Africa and Latin America appear to be underrepresented in the number of inaccuracy submissions, and so there might be an

educational point there. Users who might benefit from the bulk submission tool may not be aware of it. And opportunities are missed to find systemic issues by the Compliance Team.

So we have several draft recommendations. One is to require all new policies implemented to be measured, audited, tracked, and enforced by the Compliance Team. Another one to require all domain registrations to adhere to the WHOIS requirements in the 2013 RAA. And I'm sort of speeding through these.

Let's go to 32. Sorry.

Domain name suspended due to inaccurate information will remain in that state until it is due for renewal, though WHOIS record should be updated to a new status and the inaccurate data removed.

Draft conduct -- Another recommendation, conduct additional outreach and education on how to file a WHOIS inaccuracy report and what information is critical to provide.

And publicize and encourage use of the bulk WHOIS inaccuracy tool. Review the WHOIS RS -- ARS domain name sampled for each region to determine whether or not low submission rates to the WHOIS inaccuracy reporting tool are due to the lack of knowledge of the tool or other critical factors. And then draft recommendation 7. This one has not reached consensus, so

we're still working on this recommendations. Following a valid WHOIS ARS ticket or whose inaccuracy complaint, initiate a full audit targeting the relating registrar to check if the registrar follows the contractual obligations, the consensus policies, et cetera. Sanctions should be applied if deficiencies identified.

And the last one, direct -- contractual compliance to proactively monitor and enforce to address systemic issue. A risk-based approach should be executed to assess and understand inaccuracy issues and take appropriate compliance actions to mitigate risk in systemic complaints. The DAAR data is an additional resource. The Compliance Team has not currently included -- is not currently included in their research and analysis. The use of DAAR data would provide a different perspective for the Compliance Team, and that data is used globally to add to the security and the stability of the Internet.

So that's it on compliance. There was a lot of work there that we did and we still have more work to go.

ALAN GREENBERG: Thank you very much, Susan. We're apparently much better at scheduling the work of the review team than scheduling a presentation. We will try to keep it moving as we go forward. The compliance one is the longest one, however.

The next one is data accuracy, and we'll go to Erika Mann.

ERIKA MANN: Apologies. I'm replacing Lili Sun so I can make this short. I can only talk about two slides and we skip all the rest.

So whoever is showing here the stuff, please go to page 35 which leads us directly to the recommendation.

So Number 5 is ICANN should ensure that the requirements for accurate WHOIS data are widely and proactively communicated, including to current and prospective registrants and should use all means available to progress WHOIS accuracy, including any internationalized WHOIS data as an organizational objective.

6 -- and I will not read all of them. So some of them I will shorten but just read those complete so that you have an idea what this group is recommending.

ICANN should take appropriate measures to reduce the number of WHOIS registrations that fall into the accuracy groups Substantial Failure and Full Failure.

Next one, Recommendation 7, ICANN shall produce and publish an accuracy report focused on measured reduction in WHOIS registrations that fall into the accuracy groups Substantial Failure and Full Failure. Practically 6 and 7 go hand in hand.

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Recommendation 8, ICANN should ensure that there is a clear, unambiguous, and enforceable chain of contractual agreements with registries, registrars and registrants to require the provision and maintenance of accurate WHOIS data.

This might become a topic which might be even more relevant in the future. And then recommendation 9, Board should ensure that the compliance team develop metrics to track the impact of the annual WHOIS data reminder policy.

And then let's have a quick look at page 38.

So these are some of the topics that the subgroup identified. But you should be aware and you should know that in this subgroup, there's still this debate about some of the topics, how to judge actually nonaccuracy because there are different viewpoints how you approach the topic. And depending where you stand on this debate, you might have a different observation and different viewpoint. So please take this into consideration.

So the subgroup further identified the following issues: The objective of reliable WHOIS data has not been achieved. WHOIS inaccuracy -- oh, my God, you know what I mean -- is believed to be largely underreported; contractual obligations for registrant to provide accurate WHOIS data; and for registrars to validate and verify WHOIS data are not properly enforced.

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The WHOIS accuracy of domain names that utilize privacy and proxy services is unknown.

The action plan indicated that the ICANN Board offered an alternative approach rather than WDRP to achieve the intended results of Recommendation 9, looking back to what I said a while ago, and implementation of Recommendation 5 and 7. Again, there is still some debate about this topic.

And with this, I give back to Alan.

ALAN GREENBERG: Thank you very much, Erika. You can tell we're a rather informal group.

The next two sections will go to Volker Greimann. The first one is on privacy/proxy services and this one is perhaps the second longest one and then a very short one, common interface.

VOLKER GREIMANN: Yes, thank you, Alan. First of all, proxy/privacy services. First slide, please.

There has been a recommendation, Recommendation number 10. I assume everybody has some basis when they are interested in this topic, read this. Just as a brief summary, this recommendation was intended to provide a basis for regulating

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a previously unregulated space; making sure that certain basic requirements would be applied; and all services would be put in the regime that would be enforceable by ICANN that would protect both registrants using such services but also third parties that relied on them.

Next slide, please.

We looked at the implementations of this recommendation and found that the first step was made in the agreement between ICANN and the registrar constituency for the 2013 RAA which already regulated certain aspects of programs with regard to privacy/proxy services that were affiliated with registrars.

And based on that, finally after a couple of years, an accreditation program had been undertaken, had been part of a PDP working group. And this is currently in its final stages of the IRT.

This program will also regulate the use of services of privacy/proxy services that are not currently affiliated with registrars or other contracted parties.

Based on this analysis, we have found that the recommendation has been fully implemented. However, we identified a certain number of issues.

Next slide, please.

First of them is that the current plans of implementation foresee a certain cost barrier. That seems to some of us rather on the high end given the services provided by these providers and the benefits such providers derive from such services. Therefore, these costs might form a very high barrier of entry into the accreditation program and either force services out of business or drive them underground, both would contradict the intent of this program.

The original recommendations foresaw a system of incentives and sanctions.

Thank you, Carlton.

At this point, we only see sanctions and no incentives. Maybe this should be looked at again by ICANN staff. This is not something that the whole IRT has much control over as this is staff driven.

Another point was that potential abuse of privacy/proxy services by a registered name holder. However, it was -- we have found no reliable data that would suggest that such names and such services registered -- domain names registered through such services have high propensity for abuse of registrations. And we find that further study on this topic may be beneficial.

Next slide, please.

And from that, we derive no recommendations at this time. However, we intend to track the implementation review team progress and consider to make recommendations, if necessary, at a later stage.

Next slide is the next topic already. Two slides maybe, which is the common interface. The recommendation basically said that the -- the old InterNIC interface should be overhauled to provide a better usable interface to make WHOIS requests and find information about WHOIS complaints, where to make complaints, and stuff like that. Instead of overhauling that system, a new system was created, the whois.icann.org website which basically implemented all of the recommendations that were made -- by the first WHOIS review team. However, we found it curious that the old site was still operated, as Alan has already indicated in his part. So maybe it would have been more beneficial to replace the old site with the new site to make it more easily accessible and understandable, not have two parallel sites by themselves that might confuse the user.

There have been certain statistics of usage that we analyzed.

Next slide.

And we found that the recommendation has been followed -- fully implemented based on the usage. However, certain issues have been found. Using this new WHOIS site demonstrated at

some times no results were forthcoming. For example, if a registrar had rate limiting or certain barriers to entry, it might result in a failure -- a failed lookup. However, ICANN has not implemented any measures to track such incidents. So it was impossible for us to see how prevalent these problems were.

We, therefore, will recommend that certain metrics of use of this service and results provided by this service be derived so a future review team can look at this and can see how effective this service is.

Next slide, please.

However, the correct wording, the exact wording, of this recommendation is still being worked on.

Slide, please. There we go.

That is the current wording but we're still looking at input for that and discussing how to specifically phrase that, what data we would really like to see to help a future review team make a better review of that.

That ends my section.

ALAN GREENBERG: Thank you very much.

And the next section is internationalized domain name registration data, essentially allowing a registrant to input contact information and -- sorry, is there a problem?

UNKNOWN SPEAKER: Volker, your microphone.

ALAN GREENBERG: Thank you -- essentially allowing a registrant to input information in their own script and language, obviously which does not work currently with the seven-bit ASCII WHOIS information we have right now.

The recommendation consisted of three different parts. The first one to essentially understand what has to be done. The second one is to look at translation, transliteration. That is, make the information more accessible to someone who is working in an ASCII environment and an English environment. And the third one is to provide metrics to make sure that we understand what's going on.

In summary, all of the work has been done that could be done given that we still have a seven-bit ASCII WHOIS. We have not implemented RDAP universally. So right now we cannot store the data. We cannot access the data. But a lot of the

preparation has been done through a number of studies and a PDP.

The accuracy Reporting System, ARS, will address metrics if and when we ever get internationalized data storage. And that's the summary where we are right now. Thank you. There are no recommendations associated with it.

And where are we?

The next section is on plans and annual reports, and that goes back to Susan.

SUSAN KAWAGUCHI: Thank you. I'm just filling in for Lili Sun that couldn't be here today. So just to do this quickly, you know, this relates to plans and reports on WHOIS. And we found that the Board agreed that the WHOIS should be a strategic priority and directed the CEO to incorporate a work plan. But there's no mapping between the budget and the plans. So it's not clear what extent budget and resources were allocated.

And then the WHOIS improvement annual reports provides an overview of WHOIS policy development that are activity-based rather than outcome-based and not include figures and analysis as recommended.

So we -- on to 54, please.

We have been -- the subgroup came to the conclusion this was partially implemented. And the draft recommendation is the ICANN Board should develop guidelines for plans and reports, feasibility study, budget, resources, et cetera. And risk management should be introduced into planning stages. The annual WHOIS report should follow a well-designed template to reflect measurable outcomes and give insights into the execution of the plan.

We don't have consensus on this. We're still talking about it, so there were concerns.

ALAN GREENBERG: Thank you, Susan. The next section, this goes -- we are now finished the review of the original WHOIS1 recommendations and looking at the other things that we have been considering.

The next section goes under -- can we have the next slide, please -- goes under the imaginative name "Anything New." Essentially that was looking at all of the implementations both as a result of PDPs or negotiation that have happened since the first WHOIS review.

In summary -- and next slide just to show how complex this could be. In summary, we have found that most of the work that

has happened since the beginning of -- since the last WHOIS does not have a significant impact on WHOIS in terms of things that we consider we need to address. There are a few areas where we feel that recommendations are warranted. They fit very comfortably into other areas, either compliance or outreach, I believe. And we will be incorporating any of those recommendations that get through -- that are still there by the time we finish our final work will be incorporated into the other sections just because they make more sense. They're not necessarily going to be directly related to the past WHOIS recommendations, but they're very closely coupled to those sections. And that is everything for "Anything New.

"The next section is law enforcement needs, and Thomas Walden.

THOMAS WALDEN: Thank you, Alan. For law enforcement needs, it's a subgroup that considered -- reviewed the objective. And consistent with ICANN's missions and bylaws, the review team assessed the extent to which the implementation of today's WHOIS meets legitimate needs of law enforcement, (indiscernible) accessible, accurate, and complete data. And we did this through various ways by establishing a working definition of "law enforcement" which the review used. Identifying an approach to use to

determine the extent to which these needs were being met by today's WHOIS policies. And, finally, by identifying high-priority gaps and looking at stop measures in order to kind of oversee or get over those law enforcement gaps.

The subgroup itself decided to submit a survey to various people within the realm of law enforcement in public safety. And what we did is a surveyal attempt to ascertain the impact that WHOIS services and databases have -- the impact it has upon public safety, its capabilities, and its operations.

The survey questions, which there are 25 of, include but aren't limited to whether the agency utilizes WHOIS, which is very important; how often; and what they hope to accomplish by doing so.

And there was also -- the survey targets included law enforcement and public safety investigators, analysts, and policymakers who use WHOIS for their assigned duties and tasks.

Next slide, please.

Thank you.

The subgroup plans to conduct the survey during the month of July. The survey results will be analyzed and reflected in the first-draft report. The subgroup also respects the results to

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provide insights concerning participants' usage of WHOIS, sought insights into the impact of the current WHOIS status quo, and also the means by which they may be utilized if WHOIS is no longer available.

And that's what we have for law enforcement needs.

ALAN GREENBERG: Thank you, Thomas.

The next section is on consumer trust, and Erika Mann.

ERIKA MANN: Thank you so much, Alan. Now, that's an interesting subgroup, because surprisingly, we found very little information about consumer trust. Now, the name is mentioned many times, but then when you then really evaluate the information and the content and the context, there is very little precise information. So we relied on the previous review, which is actually a quite good -- quite good summary. So consistent with ICANN's mission and bylaws Section 4.6, the Review Team will assess the extent to which the implementation of today's WHOIS to current gTLD RDS promotes consumer trust in gTLD domain names by, a, agreeing upon a working definition of consumer and consumer trust used in this review; identifying the approach used to determine the extent to which consumer trust needs are

met; and identifying high-priority gaps, if any, in meeting those needs, and recommending specific measurable steps, if any, the other team believes are important to fill gaps.

So that's the basis. And in our group we evaluated the 2012 various reports, and we looked into different findings as well. And I think what we will do is the following, and we came to the conclusion that we will review all the reports from the different subgroups in particular and then will identify particular consumer trust gaps.

So we will do a gap analysis based on the information which we have found, either in the 2012 and in other reports, or in the findings from the -- from the other subgroups.

Now, there's one thing you have to be aware. We use a very broad definition of consumer and -- exactly, and consumer trust, and the reason is very simple. Our argument that potentially all users, Internet users, are or can become domain name users. So, I mean, that's a little bit vague definition or vague reason why we are doing this but nonetheless we believe it's appropriate for our environment.

Now, let me go to the last one where you can see some of the more precise recommendation we may want to make. Please keep in mind, because of the gap analysis we still have to do, we might come to a little bit different conclusion at the end.

So if you can see page 65, please. So to address the issues, the subgroup drafted the following recommendations.

ICANN should request from resellers more clear information, including the recommendation to include relevant information on their website. We then talk about a location where this might be done. And ICANN must ensure that RAA provides updated information concerning relevant topics in relation to consumers and WHOIS obligations.

That's an interesting point. We evaluated -- we came, during our discussion, in particular of a lack of information from resellers in relation to consumers, and we then evaluated different their websites, and it's, indeed, true, information is -- some have very precise information. For some, it's sometimes very difficult for consumers to access information. I wouldn't say you can't find it, but it's quite complicated. And when you're not very familiar in using such kind of Web pages and not very familiar with reseller practices, it's not easy for an ordinary user actually to find the information you're looking for.

So we may want to make some recommendation there without being bureaucratic or recommending everything has to be similar. Just to be able to do an evaluation, and then be a little bit more precise about this.

Alan, back to you.

ALAN GREENBERG: Thank you very much. And the last section is safeguarding registrant data, and that's one of mine.

Next slide.

The summary of the current situation is we make everything public. We don't safeguard anything. It's a very easy analysis. Clearly, going forward, there are -- you know, data will be more private, and, therefore, in terms of safeguarding, whatever safeguarding means -- and that's not clear -- it probably will get better. However, there are two other aspects of safeguarding, and that is to make sure that it's not -- not only not accessed by someone who shouldn't have it but not changed, and how do we protect data. And we found that if you look at the contract that ICANN has with escrow providers, they do specify, essential -- in very general language specify that standards must be used in terms of safeguarding the data, to protect the data against changes or unauthorized access as applicable.

There is no such contractual terms associated with the registrar or registry agreements, and we will likely be making a recommendation that that be considered.

The other aspect of it is what happens on a breach, if a breach is discovered. We could find no evidence that any of the contracts

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require that the organization notify ICANN or, in the case of escrow providers, notify the registry or registrar that a breach has occurred or a breach has been noticed. And we will be making a recommendation in that area also.

And that's it.

That concludes the overall presentation. I'm sorry we did go about 20 minutes over what we planned, but we still have a half hour now, and I'd like to open the floor to questions.

KATHY KLEIMAN: Kathy Kleiman, and thank you for your work.

I was vice-chair of the first WHOIS Review Team, and I'm not sure we ever thought every word we wrote would be analyzed the way it is. So thank you.

I wanted to talk about data accuracy and a little bit about our crazy reference to the University of Chicago's National Opinion Research Council and the crazy term substantial fail and full fail. And these are really terms -- and I wanted to share and I wanted to see if we were on the same page, that the University of Chicago defined these really as undeliverable. Unable to find or interview the registrant. It didn't mean figuring out who the registrant was, it didn't mean figuring out if I'm Kathy Kleiman or Domain Name Rights Coalition or ENIAC Programmers Project.

It just meant could you reach me. Could you reach me by telephone or by email in case there was a technical problem or a legal problem.

And so that was what we considered to be kind of what we should be going through.

I went back to that report. About 80% of registrants were contactable then, and we thought it should be more.

The 2013 RAA really made this a priority. It made verification, checking the phone number, the email address, depending on which one was considered a little less privacy sensitive. It turns out that cell phones in the United States are very privacy sensitive, but email addresses in Europe are very privacy sensitive. So whichever one was a little less, because that was going to be published.

But -- And I wanted to know if you guys had found out or had seen the information about how successful this program was, because when it was rolled out -- and I'm not making this number up -- 800,000 domain names were taken down as part of the verification process. And I wanted to know if you had gotten that information. It was presented by the registrars in London, at the London meeting of ICANN. Taken down because they didn't reach full fail or substantial fail. During the verification they were taken down. This included public interest groups,

hospitals, because it was hard to initiate this program and it was hard to get that information through. Somebody getting an email from a registrar when they had registered through a reseller might not know.

So really, good-faith efforts were taken, and it seems like we've probably achieved this one in many ways because the telephone number or the email address of all new registrants must be accurate or you don't get that domain name.

So I just wanted to share from the perspective of someone who helped write this that, you know, contactability, that was the goal, and it looks like it's been achieved, and it looks like it's been achieved at great cost.

So I just wanted to share that. Thank you.

ALAN GREENBERG: I'm told we're not using the traditional timer here but there's a red card being held up here that everyone has to watch, and we are allowing two minutes.

Does anyone want to respond to Kathy or is it -- I think just a statement.

VOLKER GREIMANN: Thank you, Kathy. That's good information. I think that will be helpful in our further discussion. And I would like to confirm the impression that you had that we've made great strides in improving the ability of third parties to contact registrants with the improvements that we've made. And we had some cases, our registrar not so many but other registrars quite a few where this program led to unfortunate events of deactivating domain names that were legitimately registered simply because the registrant did not answer in time because of the -- the requirements, the very strict requirements that the RAA foresaw.

So there has been some cost to that program, and it might be worthwhile revisiting the requirements of checking the accuracy of some of the data points, the verification aspect of the RAA. But we feel that with that, we have fulfilled our part in the data accuracy recommendation of the WHOIS Review Team 1, at least as registrars.

ALAN GREENBERG: Thank you. Microphone number 2.

UNKNOWN SPEAKER: My question is really about law enforcement agencies and how it's defined. Now, there are traditional definitions, your (indiscernible) or your intelligence agency and so forth, but

there's a whole industry of people who, in one way or another, actually try to discover scams or whatever. So how far does your definition reach outside of a traditional definition. And I know that's hard, differs between countries. And I think that's an important one because, in fact, it's probably going to face those same definitional questions with the GDPR.

Thank you.

ALAN GREENBERG: Thomas.

THOMAS WALDEN: I believe the definition is going to be defined more so by the actual agency address itself. I know a lot of times we have portals that are set up to access to get this information, and so the law enforcement agency itself would set up, would have a portable -- would have a portable. Would have a portal set up that would come back to that law enforcement address. So it would be the people that work for that public safety agency or that law enforcement agency that would use that route to access to WHOIS.

ALAN GREENBERG: Certainly from the point of view of what we're looking at, we're looking at traditional law enforcement, not the various people who do interesting things regarding cyber problems.

Number 1, please.

UNKNOWN SPEAKER: Thank you. We have three questions and one comment from remote attendees. Would you like me to read them all and pause in between for you to answer?

ALAN GREENBERG: Sure.

UNKNOWN SPEAKER: Okay. So the first question is from is Steve Metalitz regarding slide 29. Aren't registrars who executed the 2013 RAA, nearly all of them, required to apply to all registrations they sponsor, whether or not originally registered prior to 2013?

ALAN GREENBERG: I believe the answer is there is a grandfather clause which allows some to not be subject to it.

Susan, do you want to refine?

SUSAN KAWAGUCHI: Yeah. So in the ARS, WHOIS ARS report, they define them. It says ICANN will account for grandfathered records which are those records that were created prior to the effective date of the 2013 RAA for that registrar.

So it doesn't matter when the registrar signed the contract. If the domain names were already created, then they adhered to the RAA's requirements when they -- the domain registration was created, not what has gone into place after.

ALAN GREENBERG: Thank you. Next.

UNKNOWN SPEAKER: The next question is again from Steve Metalitz. Why did the team conclude the recommendation 10 has been fully implemented when the consensus policy on privacy/proxy service accreditation adopted by the Board in 2016 has not yet been implemented? Indeed, a proposed implementation plan has not even been presented yet for public comment.

ALAN GREENBERG: May I try? We had a discussion over this, and the recommendation was to implement a policy and, in fact, the policy has been adopted by the Board. It is not yet

implemented, and that's why we, in fact, do have some recommendations that will likely come out of it and a number of comments.

It's partly a matter of terminology. And there could be an argument made for why we call it not -- not implemented because it's not implemented yet, and we will likely have a footnote or something like that in the report. It's a matter of nomenclature, and it's not clear that one is right and one is wrong. At least that's the position we've taken, in any case.

Comment, the next one?

UNKNOWN SPEAKER: The next one is a question from John McCormac saying resellers or registrars? ICANN does not have a direct commercial relationship with resellers.

ALAN GREENBERG: I'm not sure what that's in context with.

ERIKA MANN: It's the context to the consumer trust. We are aware about this. We just want to be clear because we had a long debate, and that in particular, information from reseller is quite poor. So we just want to ensure that this is kept at somewhere, and definitely if

you want to have a broader understanding about consumer and consumer trust, that's the only reason. We are fully aware about the point you are making.

VOLKER GREIMANN: And maybe just one addition. the way that ICANN has traditionally handled this question is to require the registrar to ensure that the resellers are acting in compliance with the RAA. Therefore, all requirements that apply to resellers have to be enforced by the registrar.

ALAN GREENBERG: Thank you.

Number 4.

REG LEVY: I'd like to return briefly to -- Sorry. This is Reg Levy from Tucows, for the record.

I would like to return briefly to recommendation 4.3 and the philosophical thinking behind it, because I'm concerned about the technical implementation of it. I'm not entirely certain, for example, how or why a suspended domain name, because of lack of response from the registrant, should have its information

updated without input from that registrant, and what information the working group suggests be put into its place.

We often have registrants who don't respond to the WHOIS inaccuracy request because the information is inaccurate. And so when we suspend their domain name, they reach out to us.

So I'm sure that there are also instances where bad-faith registrants are suspended and then bad-faith registrars unsuspend the domain name after a period of time, but I would just like a little more clarity on that if possible.

ALAN GREENBERG: Susan.

VOLKER GREIMANN: I would like to make a comment on that. Basically the question here that was debated on that point was that for an outside party, it is not recognizable why a domain name is suspended. When a domain was suspended because of WHOIS inaccuracy, then the thinking was -- that was discussed at the subgroup level, that it should be shown in some form or shape and that the information that was found inaccurate would be removed or updated. However, there are certain issues with that that are still under discussion. For example, a suspension for WHOIS inaccuracy may not mean that the domain name -- the

information is actually inaccurate. It just may mean that the registrant has not responded to an inaccuracy verification request or something like that.

So there is still elements of that that are under discussion, and the language here is still very much unformed.

ALAN GREENBERG: Susan.

SUSAN KAWAGUCHI: And just to add on to that. Oftentimes domain names are suspended, it could be for phishing, for malware, all kinds of things. Abuse; right? So we don't know whether it's inaccurate, but a lot of times, if it is inaccuracy, it should be indicated that that's why it was suspended.

Also, when you have inaccurate data and an abuse case at the same time, then that leaves that registrant data in there, which is not, you know, not accurate, left to reside and shown to the public. Now we don't -- may not have that problem anymore. GDPR may have fixed this, but I found many cases in my previous work that the company's names were associated with abusive domain names that were suspended for phishing or spam or malware, whatever, but it said, oh, this is this company, and so it's just misleading. And it seems if this is inaccurate, it

should not reside in the data. But if you can't look it up because of GDPR, eh, might be mute.

ALAN GREENBERG: Thank you.

Number 3, please.

MARK SVANCAREK: Mark Svancarek, Microsoft, also Universal Acceptance Steering Group.

So regarding the ICANN WHOIS portal and internationalized domain names, I think it was issue 11, I was surprised at how quickly you moved past that issue and said, "Well, we just don't support it. I guess that's, whatever," and kind of moved on. Being in the Universal Acceptance Steering Group, that bothered me a little bit, and so I actually took one of our test domains that we use, it's a Hindi domain, to verify the behavior and what I noticed is it's not just that you can't return the data in any form. The portal actually says the domain doesn't exist, which is, you know, pretty much unacceptable, I think, behavior from the portal. Whereas if you went to WHOIS.com, it would say, yes, this information belongs to Datasys in India.

ALAN GREENBERG: Are you describing your problem where because the domain name is an IDN name it doesn't recognize it?

MARK SVANCAREK: Yes, IDNs can be expressed both Unicode strings and Punycode strings, and in both cases -- I would expect the Punycode string, at the very least, to be queryable, but in fact it was not.

ALAN GREENBERG: You are describing a bug.

MARK SVANCAREK: Yeah.

ALAN GREENBERG: The IDN -- They're called IDN recommendations but -- in some concept, but they are not IDN recommendations.   They are international domain name data recommendations; that is, the contents of the fields. If the portal is not responding to an IDN domain name, it's broken and, yeah, please give us the information and we'll pass it on.

MARK SVANCAREK: I'll pass it on. Thanks.

ALAN GREENBERG: We glibly ignore it because ICANN has done everything they can at this point to prepare for internationalized data to reside in the portal -- in the RDS record once the RDS record actually can hold internationalized data.

MARK SVANCAREK: Yeah, it just occurred to me that if we weren't testing it, we would miss bugs like this.

ALAN GREENBERG: I'm sorry, Carlton wants to make a comment. Go ahead.

CARLTON SAMUELS: Part of the probably would be the transliteration, the codex that they use is not fully implemented. I have heard people say this. So maybe that is the reason for it. That's why we are looking at focusing on the transliteration/translation engine to see if that can be improved.

ALAN GREENBERG: I think the situation he's describing is the data is currently in ASCII, but we can't even get to it because the portal isn't -- yeah, that's a different problem than the one we're looking at. Nevertheless, an interesting problem.

Number 2, please.

PETER KOCH: Peter Koch speaking on my own behalf. I would like to comment on draft recommendation 4.8. But, first, I have a clarifying question that the response may render my remark void.

Can I safely assume -- it's slide 33, by the way. Can I safely assume the mentioning of DAAR refers to the Domain Abuse Activity Reporting that is conducted by the OCTO team?

ALAN GREENBERG: That's the one.

PETER KOCH: Thank you. So then to the substance, the blacklist which is basically what is researched here, many of them do not provide any accountability at all. So I'm a bit surprised to find reference to such a tool in a section that deals with compliance.

And so the subgroup that reached consensus on this part might want to elaborate a bit on this very accountability aspect.

And then as a side remark, the final sentence in that recommendation doesn't really read like a recommendation but like an advertisement. And the subgroup might consider striking that out. Thank you.

ALAN GREENBERG: Thank you. On the last point, noted.

And, Susan, do you have any comment on the first part?

SUSAN KAWAGUCHI: Yes.   On the DAAR data, ICANN, you know, is providing transparency there and there's all kinds of data that might be used. Whether or not, you know, that data is valid or vetted, that's something we should -- you know, we could look into with the CTO's office.

ALAN GREENBERG: Thank you.

Number 3, please.

MICHELE NEYLON: Thanks. Michele for the record.

Draft recommendation 4.7, following a valid WHOIS ARS ticket or a WHOIS inaccuracy complaint initiate a full audit targeting the related registrar to check if the registrar follows the contractual obligations, blah, blah, blah.

I have no idea who wrote that, but that is absolutely insane. I'm sorry. That is nuts.

If you have -- if you have data and proof of systemic issues of a particular registrar and you want to trigger an audit, that's fine. I have absolutely no issue with that whatsoever. And, in fact, I would encourage it.

But triggering a full audit of a registrar based on a single complaint is -- is offensive to be perfectly honest. It's overkill. It's a massive waste of resources. It's open to abuse.

Let's say -- let's say, for example, I compete against Key Systems. So I go off, I register a domain name with Key Systems, and I provide completely dodgy data as part of this registration using one of my sock puppets. I use a VPN, whatever. This is not particularly hard to do.

I can then go off using another bloody sock puppet and another dodgy email address and an I.P. address from another part of the globe. I can then go off and lodge an inaccuracy complaint. And I can then tie up Key Systems, compliance department, legal department in knots and ICANN's compliance department in knots for something that's completely spurious.

Now, there are registrars out there who do not do a particularly good job. There are registries that do not do a particularly good job. There are criminals, there are scum bags, there are many issues on the Internet.

Triggering a full audit of a registrar based on one complaint is not the way to fix that. That is a perfectly good example of how ICANN is -- can be systemically flawed and it is the kind of recommendation that will negate the rest of your work.

VOLKER GREIMANN: Thank you, Michele. I agree. And we are still debating that one. This is still highly contentious. This is a part of the subgroup. This has not been discussed on the full group level, and I'm pretty certain that there will be lots of changes to that.

ALAN GREENBERG: I was -- we'll let Susan go first.

SUSAN KAWAGUCHI: We just put that one in there for Michele because it's really good to see him go off.

ALAN GREENBERG: I can't see the number of your microphone. 3. Turn on 3, please.

MICHELE NEYLON: This is one of those canary-type things or whatever they call it. Do they call it a warrant canary? I don't know.

So you are trolling me, Susan. Thank you.

[Laughter]

ALAN GREENBERG: We couldn't be sure you'd be in the room.

SUSAN KAWAGUCHI: I didn't write it.

MICHELE NEYLON: You were pretty sure that one of us would be.

I mean, seriously the thing -- dealing with systemic issues where contracted parties are not doing their job is one thing. But it's -- you know, there are other things if you look at some of the work they're doing in the CCT review and elsewhere, it -- looking at trends versus picking on single instances, you know, it's something that can be done but you need to be careful how you do it. You need to -- you need to make sure that you're -- that you aren't putting a ridiculous burden on one or two actors who actually haven't really done anything wrong as it were and while you are actually -- where you are letting the more sophisticated scum bag just keep on doing their business.

I mean, if you look at -- look at the bankers. The bankers that led to the global crisis, how many of them went to jail? Very, very few. How many of them do we know brought countries to their

knees? A much larger number. And it's -- it's the same with this kind of thing.

We need to be careful when we're -- when we're dealing with these things. Just think about it from a pragmatic perspective. ICANN has a finite amount of resources. The registrars and registries have finite resources. There are people who will try to abuse our systems and that will happen. We do our best to clean it up. But making us -- putting us on the rack and stretching us out like that over one or two complaints is not a good way of getting what you want.

ALAN GREENBERG: Michele, I will put my chair's hat on. I could say that we just put it in there to see if anyone was still awake.

I think you have made your case pretty well. I will give the appropriate answer. "Noted."

Next question. Do we have any more questions? We have three more minutes in the session.

No -- we have someone reaching for a sign but he's not seen. Number 2.

MICHAEL GRAHAM: Michael Graham. Just one quick note, and actually Michele just brought it up. In looking for data about consumer trust, I wonder if you've looked at the work that the CCT review team has been doing? Because they've really been trying to focus on that. I know they face difficulty, but they may have found some that would be useful for you.

ALAN GREENBERG: The short answer is yes. But they're looking at consumer trust of the TLDs, not necessarily WHOIS. But, yes, we are paying careful attention.

ERIKA MANN: This report was very good and helpful. Thank you.

ALAN GREENBERG: Number two again. We are down to our last minute or so.

UNKNOWN SPEAKER: Just a note. Having read both the initial and the draft interim report, the definition of "consumer trust" is still not cleverly -- not cleverly, it's not even clearly defined. So it's another piece of work that clearly has to be done.

ALAN GREENBERG: Last call.

ERIKA MANN: Yeah, that's correct. There's a reason for it, because we want to do the gap analysis.

UNKNOWN SPEAKER: Analyze.

ERIKA MANN: Exactly. And we are waiting for another report which comes out, I think, from your team in a week's time or so, I heard. So we will do it then, and we will be ready at time.

ALAN GREENBERG: All right. I thank you very much. We do have an address -- I'm not sure if it's in the draft -- in the document, an email address that you can send things into us. So when you get a chance to read through the whole presentation -- and there's far more in here that we could talk through and present -- your comments and input is welcome.

And, of course, there will be a draft report issued early August and should be out for comment for about two months and plenty of opportunity.

EN

Thank you.

[Applause]

[END OF TRANSCRIPTION]