ICANN San Francisco Meeting IRTP TRANSCRIPTION Saturday 12 March 2011 at 09:00 local

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Operator: Okay, recording has started.

Woman: Thank you.

Stéphane Van Gelder: Okay, welcome everyone. Thank you for being here. Welcome to San Francisco. I'd like to welcome those people that don't know ICANN or aren't used to ICANN as much as some of us are. Welcome to this kind of meeting. Welcome to our weekend sessions. No, that's not a mix tape.

That's actually the GNSO Council's work for the weekend. We go over the issues that are before us at the moment. And we have a full schedule on both Saturday and the Sunday which you can find out a little bit more about on the GNSO Council Web site which is gnso.icann.org or on the main ICANN site. And we have a link there to the San Francisco meeting.

So welcome to you all. As usual, I would - I think that's been done already but I would like to ask that priority at the table be given to GNSO Councilors. And if there's room, and, you know, and you do find a seat somewhere please do make yourself comfortable at the table. But, give Councilors priority if you can.

So, to start off what promises to be an exciting week -- and certainly a full weekend for us -- we will have a look at some of the Working Groups that the

GNSO Council - the GNSO, sorry, currently has ongoing. The first of those is an update on the report from the PEDNR Group which is - now, god, I've got the wrong accent in. Now, I'm not reading the screen. That group there, up on the screen, the IRTP Part B group.

And we will now hear from Michele Neylon who is the Chair of this Working Group and who will provide us with an update. Michele?

Michele Neylon:

Thanks, Stéphane. Good morning, everybody. I'm Michele, Chair of the IRTP Part B Working Group. For those of you who have been to the last few ICANN meetings, we've given updates in the past what was on our Interim Report and then before that our end, kind of, starting off session.

Just go through this - and if anybody has any questions. If anything is unclear please feel free to interrupt because this is part of the reason why we do this. Let's see if I can get this thing to work. Okay, so IRTP -- Inter-Registrar Transfer Policy -- it's the ICANN policy which governs how domains are transferred between one ICANN accredited registrar and another.

The key thing is here, just remember, this is between moving a domain from one registrar to another -- not between registrants -- so totally different concept.

Straight-forward process for registrants to transfer domain names between registrars. It's part of a series of five PDPs covering this area. And we started work in June 2009. We had an initial report back in May of last year with public comments, we had 17 comments received.

I was actually chatting to staff just to verify this; today's with the two comment periods that we've had, we've only received comments from the registrars and the registries. We have not received comments from other stakeholder groups. And these would be appreciate even if it was simply an

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acknowledgement of the fact that you don't have anything meaningful to say

on the subject. But the silence has been quite deafening.

We've reviewed the public comments and we've moved forward. I mean, and in our case it's actually meant that the - based on the feedback that we've got

we actually did a complete about-turn with respect to some of the things we

were looking at.

So now, moving forward, we're also getting in more community input. So the

recommendations that have - try to question a (unintelligible) were are the

charter questions? Can we return to the previous slide? No? Okay, never

mind.

Try to question, the Work Group is considering recommending requiring

registrants provide an emergency action channel as described in the SSAC

007. The Working Group recognizes no further details should need to be

worked out. This emergency action channel should also - could also be used

for non-transfer abuse issues.

Another recommendation, would be Work Group recommends that registrar

consider the measures to protect domain registrar accounts against

compromise and misuse described in SSAC 004 Section 5.

We also are requesting an Issues Report on the requirement of THICK

WHOIS for all income and gTLDs.

We're recommending an Issue Report to examine the concept of change of

control, including an investigation how this function is currently achieved.

What we mean here, change of control as in to who controls the domain

name. It's already at particular models in the country code name space and

any associated security concerns.

Next recommendation, recommend modifying section 3 of the IRTP to require that the registrar of records/losing registrar be required to (unintelligible). Sorry? Oh (unintelligible) for help. Be required to notify the registered name holder/registrant of the transfer out. At the moment it's optional.

Six, modification to deny reason number six. For those of you who aren't that familiar with the current Transfer Policy, there are a number of specific reasons for which a registrar may deny a transfer. This is what I was referring to because there's lots of sections which might cause confusion.

Modification to deny reason number six so the language is expanded and clarified to tailor it more to explicitly address registrar-specific i.e. non-EPP locks in order to make it clear that the transfer contact, often the registrant, must give some sort of informed optioned express concerned -- actually that's a really horrible sentence -- I'll translate that into simpler English.

It's basically so that your - the registrant is making more conscious decision about the locks that may be applied to the domain in simple terms. You'll have to excuse the language there but we have to be fairly precise so we end up rather unworkable sentence. But that's more for the legal people sitting in the room.

Number seven, if a review of the EDRP is conducted in the near future, the issue of requiring the locking of a domain name subject to EDRP proceedings is taken into consideration. A couple people found this idea a little bit confusing. It's just at the moment there is what happens out there and then there is what's actually mandated in policy. And the policy isn't that clear.

Recommendation number eight, the Working Group recommends standardizing, clarifying, who it stages messages regarding registrar lock statuses.

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And on chair to question E. The Working Group recommends deleting and deny reason number seven as a valid reason for denial under section 3 of the IRTP, as it is technically not possible to initiate a transfer for a domain name that is locked and hence cannot be denied making this denial reason obsolete. Instead, denial reason number 7 should be replaced by adding a new revision in a different section of the IRTP and when and how domains

We currently have a comment period open on this and we would really like to get some feedback from the community, specifically from the stakeholder groups that didn't provide any good feedback so far, would be nice. And then we will hopefully finalize everything and wrap this up.

And if you want more information, there's plenty of it available on the various parts of the ICANN Web site. And there's several members of the Working Group are also here in the room. And would like to take this opportunity just to thank the work of the other members of the Working Group and the fantastic support of the ICANN policy staff, in particular, Marika.

Thanks, if anybody has any questions.

may be locked or unlocked.

Stéphane Van Gelder: Thanks Michele. And if there are questions, I'll (unintelligible).

Man: Thanks Michele. Quick question on, I think it's recommendation number three

which is the requirement with the (unintelligible) for all registries, I think it's...

Michele Neylon: No, that's not the recommendation. The recommendation is an Issues

Report.

Man: Yes.

Michele Neylon: Sorry, we had originally suggested something stronger, but we know that

there are potentially landmines. So an Issues Report - in other words, let's

have a look into this. Because one of the areas we feel is causing issues is the inconsistency between the WHOIS statuses and WHOIS output between THICK and THIN.

Man:

Right, right. So, actually thanks. That's - my question wasn't so much on that outcome. But on the notion of - at this point and time I think there's only one registry - maybe has several TLDs that it manages, maybe two registries. I think it's the com, net, and jobs registries that are the only THIN ones currently?

And one of the things we're going to hear a lot this weekend is the resources and what we can actually do PDPs on and trying to reduce staff load and trying to manage all of those resources.

And I was wondering if anyone, and I don't mean to put anyone on the spot, but since it really would be directed towards one registry operator, if it's something we need to consider as far as whether to initiate a PDP on something that only affects one registry operator.

And maybe that could be best achieved by talking to that registry operator and see if this is something they are willing to entertain or able to entertain as opposed to going through an Issues Report, a full PDP, using up a lot of resources when it really affects - granted it's the largest TCLDs, but it's still, you know, one registry operator.

So I wanted to hear peoples' thoughts on that as opposed to going through a full-fledged PDP. Because if it's something that - and again -- I haven't talked to the registry and I don't know if anyone has -- but if they're willing to do it on their own it wouldn't necessarily need to be a PDP.

Michele Neylon:

Just before I leave that open to other people. I mean, there's very - it's not simply a question of just talking to VeriSign in that respect. You also have to take into account that the VeriSign were to have THICK WHOIS then that

means that the registrars would lose a certain degree of control, possibly. I mean there could be other areas with that. It's not just simply (unintelligible) will, you know, registry X, which in this case is VeriSign GY.

Man:

Will that - I understand. So - but that's - I mean if VeriSign said, "Yes, we can see doing that in the next few years," or whatever, and then have a discussion directly with the registrars, there wouldn't need to be a PDP. And what I'm just trying to do is - and if you look at the rest of your (unintelligible) it's well done.

But there's a lot of areas where it's been Issues Report, PDP, or more work that needs to be done clarifying this. It just - it seems like there's going to be a lot of work that comes out of this. Work that should be done.

I'm just trying to figure out how we as a group can reduce that workload. So if a PDP doesn't need to be done because the registry says they'll do it, and then talk to the registrars about how best to do it, that might be a better outcome.

Marika Konings: Go ahead, Stéphane.

Stéphane Van Gelder: I was going to say that - do you want to get - there's the queue so - you.

Yes, okay. Yes.

Marika Konings: And if I can just ask everyone to mute their computers because the echo is actually caused by audio that's coming from other feedback from the audio on peoples' computers. Thank you.

Stéphane Van Gelder: Okay, thanks Marika. So I have two minutes. Tim? Okay. (Kristina) and then Marika and Wendy.

(Kristina): Thanks. Michele I have two questions about the recommendations. The first

is, are they listed in priority order based on the view of the Working Group? In

other words, was the Working Group number one...

Michele Neylon: Oh...

(Kristina) ...recommendation ranked number one?

Michele Neylon: No. They will be - the Working Group had a number of questions that we had

to address, that the recommendations are to address.

(Kristina): And the, and the order corresponds to...

Michele Neylon: To the actual question. It's not a keg question of, we really want this and this

is the secondary, etc., etc., etc., nothing like that. It's like...

(Kristina): Okay.

Michele Neylon: It's like we had a number of questions that we were asked to look at. We

have and we hope that we have attempted to address all of those questions.

But we have a number of recommendations which slots in with those

questions. But as the IRTP, unfortunately, it's not as easy at times to kind of

clearly demarcate, you know, Question A versus Question B.

(Kristina): All right. Just on a follow-up on that and just picking up on the point that (Jeff)

alluded to mainly prioritization. If that was something that the Council were to request the Working Group to do to try and facilitate our ability to do that, do

you think that's something the Working Group could do?

Michele Neylon: I think it's something we'd have to discuss, but I don't see any reason why we

wouldn't be able to.

(Kristina): Okay.

Michele Neylon: It's not up to me personally, but I would ask the other people in the group who

put in their time for this, too. But I personally don't see an issue with that.

(Kristina): All right. And then finally the last question is, what I wasn't clear on and I don't

know to what extent we kind of formally adopted the method of identifying the

level of support for a particular recommendation. But are there any

recommendations that are in the Final Report that have a less than full

consensus support from the Working Group?

Michele Neylon: No. No.

(Kristina); Okay. Thank you.

Michele Neylon: We - to be perfectly frank that still is quite clear. Unless somebody decides

now to do an about-turn on me and embarrass me publicly, which would be fun, I'm sure. Would make the subject more a lot more interesting. All of the .

. .

Stéphane Van Gelder: Can I do that?

Michele Neylon: You're going to do that anyway, Stéphane. All of our recommendations are

fully supported by all members of the Working Group. We didn't have to get into any debate discussion or anything about, you know, various levels of

support. So we didn't even bother mentioning it because it was moot.

(Kristina): Actually suggest that once the Report if finalized that there be some

indication of that, both in terms of, you know, if you all - if we do decide to request ranking or rather if we don't, to have that there in the report. Because

my initial reaction when I read this was, "Oh, well this must be in the order of

priorities."

Stéphane Van Gelder: Oh..

Michele Neylon: Yes, thanks to you both, that's very helpful. Marika?

Marika Konings: (Unintelligible) to (Jeff)'s question on the request for an Issue Report on

THICK WHOIS. The line jump in the presentation is just the abbreviated version. If you read the whole recommendation you will see as well that, I think the intention of the Working Group asking for the Issues Report is also

to look at all the aspects of the required THICK WHOIS.

It's not just the Working Group thinks it might be a good idea. They want to know as well are there any negative consequences? Are there any reasons why it shouldn't be done? Yet, there's it's not a lot of input from the community on that question.

And at the appointing, of course it's easier just to have a direct discussion. But, you know whether you're thinking of going down the Issue Report route to make sure that all consequences are taken into account before a possible requirement is made to have (unintelligible) of the registries.

Michele Neylon: I'm going to peer over at Stéphane. What - it looks like Wendy's next?

Wendy Seltzer: Thanks. Thanks to Michele. Wondered whether the group had heard from

registrants in different sorts of US cases around the domain hijacking? So users' commercial domains, users in situations of human rights or protests,

political cases. Might have different interests or concerns around the domain

hijacking.

Michele Neylon: No. The short answer would be no. The longer answer would be that as a

result - based on the feedback we received from our initial report we tried - and the problem here we had was trying to kind of balance the same way so that it wasn't a case of as if we were preferring a particular user group thing,

usage scenario. I can (unintelligible) the best way to word it diplomatically.

We tried to get some feedback from specifics types of users. We also were trying to work on the basis of fact-based policy development as opposed to he-said-that-she-said-that-something-happened types of stuff.

But I mean even to talk to your query specifically, no because it's not really - while I'm sure that there are cases of these things but there are potential cases, the hijacking is more to do with somebody and hacking into an account and taking control of a domain. It wouldn't be specific to the extra usage of the domain.

Wendy Seltzer:

Thanks, and I appreciate the interest in fact-based decision-making. And part of my question is whether it would be helpful in the remaining comments to add any facts around non-commercial uses and users.

Michele Neylon:

The reality is that this -- in terms of hijacking and all this -- we don't have a huge number of hard statistics to go by. We have, you know, some of the larger registrars who have dealing with larger volumes of domain names and who have put in place certain things to prevent issues for hijacking and everything else.

You can - you have been able to share some of their experiences but it's not exactly something that you can track as easily as say, a number of net ads for a particular TLD, or something like that which is nice and binary and clear. The other thing is with respect to say the usage and everything else. We also had to hear from those people who feel that they are the most impacted or who are going to be the most harmed.

So I don't - it's like with the comments. We receive comments from people who care a lot. But we haven't received comments from people who might think that the current status quo is perfectly okay. And the fact that they haven't given us that means that we don't actually know that they're okay with other options. They've been incredibly silent.

Stéphane Van Gelder: Thanks. So I have Chuck, (Jeff), James, and Adam. Chuck?

Chuck Gomes:

Thanks, Stéphane and thanks Michele and all of the Working Group. You've been working at it a long time. It's a good product. I think you're going to be the Council's going to be talking about one issue over and over again all day as you look at work to be done. And that's priorities and how do you get the resources and so forth.

And I'd like to encourage all of the stakeholder groups and constituencies as well as the Council to consider focusing on the budget framework. If you look at that budget framework stuff and it's actually trending upward instead of downward. And in terms of the GNSO registry fee contributions to the budget, it's over 94% in the current budget framework.

And I think it's a real shame that things like the Transfer Policy that they couldn't, you know, were years behind when we should have done the review. And the reason is because we have to spread things out and take it serially in order to make it realistic in terms of workload. But I think it's a shame that when over 94% of ICANN's revenue is coming from fees that ultimately come from GNSO registrants, that we have to have a shortage of resources.

I'm not saying that the GNSO should - fees shouldn't help subsidize everything else that ICANN does which is the current state. But I am saying that I think we should all be concerned that we have a resource shortage. And I'm not demeaning at all efforts to be efficient if we don't need a PDP to get - let's be as efficient as possible. Let's prioritize things and everything.

But I think we all should also take another tack and that is to recognize that, hey, we should quit complaining about GNSO or limited GNSO resources when over 95% of ICANN's revenue comes from the GNSO side of the house.

Stéphane Van Gelder:

Ider: Chuck, that's very suited there because I think the point you just made will probably ask - probably people will want to come back to it. And I think it's a very important point. Obviously (Jeff) has already alluded to it. We all know that it's something that we've been discussing with the staff and amongst ourselves. It's something that we will be coming back to over the weekend; the resource issue, the prioritization issue.

And maybe we can discuss it during one our sessions today. Just to remind people that from 12:00 to 1:00 we have a session where we have planned to discuss various things including the potential motions that we'll look at on Wednesday during our Open Council Meeting. And that time may also be subject to air some of those issues out.

So maybe we can do that then or we can pick up on points as we go along. But I do think that that is a crucial issue facing us. And it's something that we need to have a discussion on. So Chuck, thanks very much for making that point. (Jeff)?

(Jeff):

Yes, just getting back to something Marika said in the report about talking about THICK WHOIS and from my, again, personal viewpoint, haven't talked to the registries about this, but a PDP at this point of time on THICK WHOIS is, you know, the train's already kind of left the station. It's already a requirement for all new GCLDs.

So it's not something - THICK WHOIS is what's happening. It's what's going to be in place for every new TLD. It's in place for every existing TLD except for com, net, and jobs, I think. So my only point is that if you have -- and again, haven't talked to the registry at all -- but if you have a registry that's willing and able to do it. and you have discussions that go on between the registry and registrants about any issues, it would save us all al PDP that we just don't have to do.

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If there's really an interest in doing a PDP on THICK WHOIS to study whether

it's been a good thing or a bad thing, wait a few years until after UGCLDs are

implemented and we can get a real good statistical study and data. But at this

point in time, you know, again personally, it's not something that I would be in

favor of.

Stéphane Van Gelder: Thanks. I think this is really good, the discussion that we're

starting to have now. I'm sorry that it's maybe intruding on the stuff that you wanted to discuss, Michele. But, you know, these weekend sessions perhaps they're slightly less scripted and they do allow us to just go off into certain directions that we need to discuss and take the opportunity that we are

seeing each other face-to-face to have these discussions.

I would encourage, you know, other Councilors and other groups to jump in if they wanted to, pick up this discussion. And maybe it's not directly related to

the Working Group that Michele chairs, but we will accommodate that if we

can.

James, you are next.

James Bladel:

Thanks Stéphane.

Stéphane Van Gelder:

Sorry, just say how are you to...

James Bladel:

James Bladel from Go Daddy, a member of the Working Group. And I think,

just - when I raised my hand it was topic A, but I think the topic B is kind of,

has spilled over into it. So if I could comment on that really quickly.

Hopefully this group would be - would appreciate that we are, you know, at

the Working Group level trying to be agnostic as to budgetary concerns and

prioritization when it comes to deciding my policy issues. I mean, certainly we

wouldn't want to say that this is a good idea for a policy. Or this is something

that is causing a lot of harm and needs to be fixed but we know it's not in the budget.

I mean, I think that, you know, deferring our decisions to this level is probably, I would assume what you want us to do. Please correct me if that's not the case. Maybe the prioritization that you were talking about, (Kristine), is the best approach to that. And then just, kind of, leave those decisions to the next level.

But to touch on something that Michele was speaking on earlier in response to Wendy's question. We really focused a lot on the hijacking issue. And some of us were, I think, concerned that we were spending too much time on that to the detriment of some of the other charter questions.

And that we really emphasized the mechanics of hijacking and not necessarily the impact in treating all hijackings, whether it was, you know, Alexa top 10 domain name or whether it was, you know, my grandmother's recipe blog or something as having, you know, normalized equivalent impact to that particular person.

But, you know, I think if there's something that we're missing with that with respect to the differing impacts for -- I think you were mentioning political speech and things like that -- then we definitely really need to get that into the comments because that's not something that we considered at all. Thanks.

Stéphane Van Gelder: Thanks, Jim. Alan's next.

Alan Greenburg: Thank you. Alan Greenburg. A few quick comments. Again, probably not on the PDP itself, but Michele made a comment early on that in the previous report they received a bunch of comments and made a lot of changes because of them. But didn't receive comments from a lot of people. The tendency I think in these comment periods is if you wholeheartedly support what's going on, you just don't say anything.

And there's a real danger that the people who are vocal get things where changed whereas people who are completely happy with the report lose what they're seeing out of it. And somehow we have to get that message across, you know, the only reason to comment is not because you want to see changes.

If you're happy with it you probably need to say so in some way, and probably some strong way because a weak, "Yes, okay," is not likely to offset the negatives that come out very vociferously. I think it's a real failing of the comment of the process.

And the other comment with regard to Chuck's balancing of where the money comes from and money spent on GNSO, I think is a very valid statement. However, when we talk about prioritization we often talk about the prioritization as it affects the stakeholder groups and the various constituencies. And I've said before, and I'll say again, I think that to some extent is a red herring.

When I look around this table there is less than a half a dozen people who I see on Working Group after Working Group. And in all of these Working Groups we tend to have virtually no representation from some of the stakeholder groups and some of the constituencies.

We lost something when we went away from task forces where there was required balance representation in that people are just opting out completely and walking away from these things. And I think we need to fix that somehow. Thank you.

Stéphane Van Gelder: Wow, so we just had a process for those who aren't clear on this and the (unintelligible) are still going through, called restructure which has made us move from what Alan was describing to the model we have today.

And that's perhaps another topic that we may want to try and touch on over

the weekend if we have time. Because it seems that some of the results that we have from that process aren't to everybody's satisfaction.

And I see a few people nodding around the table. So, you know, if you do want to take up that topic at some point and open that discussion, perhaps that's something that would be useful.

I also think the resource issue isn't necessarily linked to how many people are on the Working Group in a direct way. It may be, but don't forget that the resource issue is also one that the volunteers find themselves dealing with. We all have, well most of us have day jobs, and it is very difficult to stay involved at the level that is required to participate actively on these Working Groups.

So I think we also have to be mindful of that and not, you know, make people feel guilty that they're not being that involved in all the Working Groups. It is difficult to keep up with them and stuff. Mikey?

Mikey O'Connor: Hello, this (unintelligible). This is Mikey O'Connor a member of the business constituency in (unintelligible) of the (Phil Connor) Company of St. Paul. I was on the Working Group as well. And I wanted to amplify something that Chuck said.

> The recommendations about the whole issue of urgent return is 6 years old. The SSAC report that we reference in this document was written 6 years ago. It's - we're on IRTP B. There are five total IRTP chunks in the queue and 6 years after SSAC wrote the report we're finally, probably, 2/3 of the way through the second of five EDPs.

So the resource problem and the scheduling problem and the growing backlog of policy issues is a problem that's not going to get better anytime soon unless we do something about it. That's all.

Stéphane Van Gelder: Thanks Mikey. Tim, can I - I actually just, sorry, realized that we've run out of time. I thought (unintelligible) and it's half an hour. So, Tim, can I ask you to close comments on this and then we'll move on to the next topic.

Tim Ruiz:

I just wanted to agree with Mikey. I think that - and I'm not suggesting we table the rest of the Transfer PDPs, although I'm not - I wouldn't be opposed to talking about it as this point either. I mean we're coming up to a situation where -- though we think it might not be long but it might be another year yet - we could have, you know, dozens of hundreds of new GTLDs and all the transfer issues that we're facing today may be nothing compared to some of the things that might crop up when we have that many GTLDs.

So I think, you know, when things go on too long we have to rethink what we have on the table. And either maybe something needs to be refreshed when we have to rethink whether it's something we should be pursuing based on current changes.

But one way or the other, yes, I think we shouldn't get to that point. Somehow we should figure out how we can handle our workload in a timely manner.

Stéphane Van Gelder: Thanks Tim. Okay, so we'll move on. I'll just ask Michele if you have any closing remarks and then we'll move on to the next topic which is PEDNR this time and Alan will be giving us an update there. Thanks.

Michele Neylon:

Thanks Stéphane. Just in closing, if anybody has any questions, queries, or need any clarifications on anything to do with the Working Group, there's a load of us here. There's myself and there's a bunch of others down that end of the room.

We have a comment period open at the moment. We really do need comments. Alan, I appreciate what you were saying. It's very, very true. Some of stakeholder groups have been noticeable in their total lack of comments. And it would be appreciated if they just gave us something to say,

"Yes, it's okay. We don't have a problem with this." Or, "No, it's not. We think it's terrible." But just something, please. Because the silence is deafening and it's not very helpful.

I think the last thing we want is to spend, you know, the thick end of two years working through this and - for then people to turn around at the end and go, "Oh, you changed all the policy and it sucks and we hate you." Because we're going to go - look, you've got the opportunity to give us some feedback. Please do and thanks.

Stéphane Van Gelder: Thank you very much. So we'll move onto the Post-Expiration

Domain Name Recovery or PEDNR which is on its final reports. And we will
have a presentation. I think you'll have to move up to where, yes, where

Michele was. And we'll have a presentation from Alan Greenburg.

(Jonathan)?

(Jonathan Robinson): Hi, just a - it's (Jonathan Robinson). I just - (unintelligible) comment, Alan.

It strikes me that one opportunity here is (unintelligible). Sorry. That there may be an opportunity for - in any comment period to put a multi-stakeholder placeholder in at the head of the comment period. Because what we tend to do is just leave a big open space and whoever comes in gets to comment.

And it could be seen that there was almost a - some form of practical opportunity it would almost, I wouldn't like to use the word embarrass people, but show that there would be nothing put in that from a particular stakeholder group. And at least create the - I don't know.

I don't have a fully-formed suggestion. It occurs to me if there were sets of opportunity and some way in which it could be shown that there was no comment from various areas rather than simply an open opportunity for active comments. So I'm sorry if that's a little bit of a rambling suggestion. But I'm wondering if there isn't a way of leaving some sign to people to comment where there's a lack of comment from different groups.

Stéphane Van Gelder: Thanks. Alan, please go ahead. I'm sorry for keeping you waiting.

Alan Greenburg: That's okay. I planned to go through the whole coffee period. All right. Thank

you. I've got a number of people from the Working Group who (unintelligible) outline the situation at the time addressing five questions that were posed in

the (unintelligible).

Man: No, but they have a new transcript that they wanted to start for the PDP

(unintelligible).

Alan Greenburg: (Unintelligible) so there will be some adjustments partly because we just ran

out of time in talking through some of the issues. We came right down to the

wire on a couple of the critical issues where the substantive recommendation

was not made until just before publication deadline.

The comment period is open until April 7. And we would appreciate

comments from all parties. As with the other - with Michele's task force or

Working Group rather, the participation in our Working Group was not

particularly balanced. And we would like to see input from the comments. In

any case from the whole community.

I think these recommendations fall under the...

END