
ICANN76 | CF – Rights Protection Mechanisms Implementation Review Team
Wednesday, March 15, 2023 – 15:15 to 16:15 CUN

ELISA BUSETTO:

Hello and welcome to the third meeting of the Rights Protection Mechanisms Implementation Review Team on 15 March 2023 at 20:15 UTC. My name is Elisa Busetto and I'm the remote participation manager for this session. Please note that this session is being recorded and is governed by the ICANN Expected Standards of Behavior. During this session, questions or comments submitted in the chat will only be read aloud if put in the proper form as noted in the chat.

I will read questions and comments aloud during the time set by the facilitators of this session. If you would like to ask your question or make your comment verbally, please raise your hand. When called upon, kindly unmute your mike and take the floor. Please state your name for the record and speak clearly at a reasonable pace. Mute your microphone when you are done speaking.

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LARS HOFFMANN: Thank you, Lisa. My name is Lars Hoffmann. I work in the Global Domains and Strategy function, ICANN. And I'm what we technically refer to as the project sponsor I think for this project which means I get to give this introduction and hand it over to Antonietta afterwards who is the real expert. If we can just take a quick look at the agenda on slide 4. So obviously, I'm doing an excellent job with number 1. And then Antonietta is going to talk us through the presentation, give some background. We had an ICANN meeting. We don't do this during normal or Zoom sessions but we thought for this purpose [inaudible] some background on the RPMs and the IRT.

Also, a quick overview of the project plan. And then under 4, we're going to get into some substantive work sharing some proposed changes to policy language based on the recommendations in the report. We'll talk about next steps and then obviously, if anyone has any other business, that comes under 6. If anybody in the audience has any questions or would like to contribute, there are still spots at the table. You can either stay there and come forward for questions or make your way to the table now. And with that, I'm going to pass it over Antonietta please.

ANTONIETTA MANGIACOTTI: Thank you, Lars. My name is Antonietta Mangiacotti. I'm also on the GDS team and I'll be covering the next agenda items in this presentation. So starting with the policy implementation background. So how did we get to where we are now? Back in February of 2016, the council resolved to start a two-phased PDP to look at all RPMs and all gTLDs. So the first

phase of the PDP focused on reviewing all of the rights protection mechanisms that were launched under the 2012 new gTLD program.

As many of you may know, these rights protection mechanisms were created to mitigate potential risks and costs to rights holders that could arise in the expansion of the new gTLD namespace as well as to help create efficiencies for registries and registrars during gTLD launches. The rights protection mechanisms that were reviewed by the PDP Phase 1 Working Group were the Trademark Post-Delegation Dispute Resolution Procedure, the Sunrise and Trademark Claims Services which are offered through the Trademark Clearinghouse and the Uniform Rapid Suspension Dispute Resolution Procedure.

In November of 2020, the working group finalized its final report. And then the following year, the council approved all of the 35 recommendations that were contained in the final report. So following the council approval of the recommendations, the report was transmitted to the board. A bylaws mandated public comment period took place and ultimately the board approved all of the 35 recommendations and directed a [inaudible] approach for the implementation work that was based on timing, staffing and resourcing.

In adopting the recommendations, the board also noted that the implementation work would be divided into several categories. The first being recommendations that call for updating existing operational practices or documents concerning the RPMs. Then there were also a total of nine recommendations to maintain the status quo for the rules that were applied in the 2012 round. There were also six

recommendations that require substantial time and resources to implement and would involve working with multiple stakeholders. And lastly, four recommendations that affect subsequent rounds of new gTLDs.

So following the board adoption of the recommendations, staff began working on an implementation plan for 22 out of the 35 recommendations that were put forth in the final report. These 22 recommendations, they're not part of the implementation of the subsequent procedures PDP recommendations. I'll get back to that in a second, but in terms of the implementation plan for the 22 recommendations, it incorporates a phase approach so that it allows for the more straightforward to implement recommendations to be implemented first and those that require more time and resources, those would be implemented sequentially according to level of effort.

With regard to the remaining 13 recommendations that are not part of the implementation plan, these will be implemented and integrated into the work related to the subsequent round of new gTLDs. Specifically, 9 of these 13 recommendations that recommend the status quo and so it would involve documenting and informing the community as to how the status quo will be maintained as it relates to the next round. And then there were also four of the recommendations that called for specific changes to the base registry agreement or applicant guidebook again as it relates to the next round.

So in reviewing the recommendations that were put forth by the working group as well as the categories identified by the board and the board resolution and board paper, we determined that the

implementation work for these 22 recommendations could be divided into five groups. The first being recommendations that relate to updating existing procedural documents concerning the RPMs. So for instance revising the URS rules and procedure in accordance with the language that is being recommended.

And the second group there, there are four recommendations that relate to developing educational materials to help users of the RPMs. So for instance, of course, working at the IRT URS providers, maybe other interested parties to develop forms, FAQs, and other guidance to help complainants and respondents that are using the URS. There is also one recommendation for stakeholders involved in the URS process, so registries, registrars, URS providers, ICANN org to make sure that each other's contact details are up-to-date so that that process can work efficiently.

There is also in group four one recommendation to collect data concerning the RPMs. And so, it would involve working with Trademark Clearinghouse providers or registrars to collect further data on the RPMs. And lastly, in the fifth group, there is a recommendation to create a new compliance mechanism for URS participants to be able to specifically make and submit complaints about a URS provider conduct or performance.

So in terms of current status. So ICANN org and the implementation review team that was created to help the org in implementing the phase 1 recommendations which was recruited through a call for volunteers that was launched in October of last year I believe. So we had our first meeting in December of last year and we worked through conference

calls and the IRT has been very helpful in providing timely input via the Google Docs as well as the mailing list.

So currently, the implementation teams and the process of implementing the 15 recommendations that are in group one. And we estimate that implementing these will take around six months from the time that the implementation work began in December. And as also noted in the RPM implementation plan, these recommendations are being implemented first as they've been identified as more straightforward to implement compared to the other recommendations as they involve updating existing procedural documents. So the IPT works on taking initial step but revising the RPM-related documents and then a red line version is shared with the IRT for their review and input.

For the remaining recommendations, we estimate that the implementation here would take at least one year to complete. As mentioned, these are more complex and require working with multiple stakeholders. And so, implementing the remaining recommendations will take place once those in group one have been implemented.

In terms of this agenda item, we wanted to mainly focus on the IPT proposed changes to the Trademark Post-Delegation Dispute Resolution Procedure and the Rights Protection Mechanism Requirements. In terms of the URS document, so we've been working with the IRT on this. We revised the URS document in accordance with the recommendations. We shared a red line version with the IRT. The IRT has had a chance to review those materials and provide input. We

have no concerns with the additional suggestions and edits made by the IRT. So we suggest that for now we put those documents aside.

However, these materials will be posted for public comment. So the IRT will have another opportunity to take a look at all of these documents to see if there are any concerns or if there's anything that has been missed before they are published for comment.

And so next, we will take a look at the proposed revisions for the TMPDDRP and RPM requirements. So starting with the TMPDDRP rules. So the changes here relate to one recommendation coming out of the phase 1 report and it concerns rule 3G of the TMPDDRP. Specifically, the working group recommends here that this will be modified to provide that multiple disputes filed by unrelated entities against a registry operator may be initially submitted as a joint complaint or may at the discretion of the panel be consolidated upon request. I know the comments that have been added here are very small so we've been reading them out loud.

Also wanted to point out here—I'm not going to read the entire recommendation text but just to point out a few key things here that were raised by the working group that in the event that the TMPDDRP provider supplemental rules do not allow the filing of a joint complaint or the consolidation of several complaints that the providers amend their supplemental rules accordingly. So the IPT ICANN org will review those supplemental rules and work with the providers as needed to make sure that the rules are amended to be in line with what is being recommended.

The working group also notes that the filing of a joint complaint or consolidation is to be permitted only where the complainants relate to the same conduct by the registry operator at the top or the second level of a same gTLD for all complaints so that language has been carried over verbatim here in rule 3G. And that all of the trademark owners has satisfied the threshold review criteria specified in article 9 of the TMPDDRP. So that has been added as well.

And to clarify, this recommendation is intended to apply to two distinct situations. One where several trademark holders join together to file a single complaint and the other where several trademark owners each file a separate complaint but request that these be consolidated into a single complaint after filing. As part of the recommendation, it is recommended that a reference also be added to article 9.1 of the TMPDDRP procedure. So as you can see, the reference that has been added to the second to the last sentence.

BRIAN BECKHAM:

Hi, I'm Brian Beckham from WIPO for the record. Just a question. I know that the proposal to add for example language on consolidation of claims for the PDDRP comes from the recommendations of the working group as does for example some adjustments to the TM claims notice. Is it the intention that whatever mark-ups to the PDDRP or the claims notice would be proposed through this IRT would be put out for public comment?

ANTONIETTA MANGIACOTTI: Yes. So the intention is that all of these documents will be posted for comments so that the community will have a chance to review the proposed changes and then we will consider the feedback received and update the documents accordingly.

ELISA BUSETTO: Any questions? Griffin, you have a question, right?

GRIFFIN BARNETT: Yeah, Griffin Barnett here. Hopefully, you can hear me. Sorry that I can't be there in person this time around. Maybe next time. My comment just relates to the wording in the highlighted section here towards the bottom that I just noticed where it says, after threshold panel be consolidated upon request. Do we just need to make that active voice as opposed to passive voice or clarify that the request comes from the complainants or the perspective joint complainants as just sort of a point of clarification? Because I'm assuming that's not something that the registry operator against whom the complaint is being filed would request but I think it [inaudible] clarifying that. Thanks.

ANTONIETTA MANGIACOTTI: So I think that that is a change that we can consider making. We will take note of it and discuss it and update the suggestion you made.

GRIFFIN BARNETT: Thank you.

ANTONIETTA MANGIACOTTI: Something else that we also wanted to flag for IRT discussion perhaps here or for the comment feature in the Google Doc once maybe the IRT has had a chance to review the changes and digest the proposed revisions that have been made but something to think about is that—so the first sentence you will see here in rule 3G which we have not changed we think that the concept there is covered by the second sentence. That has been added per the TMPDDRP final recommendation. And so, we believe that this sentence here could be deleted. But before doing so, we wanted to make sure that we wouldn't be losing anything if we were to remove it.

So just something to think about that we don't have to answer now, but we look forward to receiving IRT input on that as well. So in terms of revisions to this document, that's pretty much it. We have another question? I'm not seeing the questions. Sorry, we're trying to pull up a question that we just got.

ELISA BUSETTO: Susan, you can take the floor.

SUSAN PAYNE: Thanks. Hi, it's Susan Payne. I kind of see there's a bit of an overlap between that first sentence and then the other highlighted language. But if deleted, if the first sentence were deleted, I think we might then lose that concept of both parties agreeing. So I wouldn't object to removing that sentence but I think you still need then in what remains to capture the concept that it's not just the discretion of the panel to be

consolidating but I think the intent was that the parties would agree. Is that correct?

ANTONIETTA MANGIACOTTI: I think so. I think we debated on whether it would actually take away from what's being proposed here if we were to remove that. And so, it's covering two different situations and I think that it is a fair suggestion to consider keeping the language if other IRT members are also on board with that. We don't have any concerns with keeping it.

BRIAN BECKHAM: Sorry, Brian Beckham again for the record. When it says concerning the same conduct, I'm not sure that works. If it's unrelated entities, then the conduct would necessarily target those unrelated entities. So I understand, I think the same conduct that's being complained of, it targets them similarly but it would be conduct targeting each of the respective trademark owners.

And then where it says that either the complaint can be initially submitted or at the discretion of the threshold panel, I wonder if that maybe excludes the—I can't remember the terminology but I think there's another panel that follows the threshold panel. So maybe want to preserve that panel's discretion to also look at the consolidation question.

ANTONIETTA MANGIACOTTI: Thank you for your feedback. Again, we're taking notes on what's being suggested here. We can take it back and discuss and consider

incorporating these changes here to this document. If there aren't any other questions or feedback...?

SUSAN PAYNE:

Yeah, thanks. I just posted in the chat. In responding to Brian's comment, I think that's right. I think the recommendation the working group made was engaged in contact that has affected the complainant's rights in a similar fashion. And that's not quite the same as how it's expressed. I think I'm supporting Brian's comment. I think it's similar but it's not quite the same and I think it might have a different effect.

ANTONIETTA MANGIACOTTI: Thanks. Yeah, we can go ahead and [inaudible] the language. The intention here was to carry over the exact language that was in the recommendation. So if we haven't done so accurately, we will go back and take a look to make sure that it reflects what's being recommended.

So I think next, we can move to the RPM requirements and the proposed changes here. We've made some formatting changes. Some links have also been updated. I know that the internet draft for this functional space specifications recently became an RFC. So an RFC number was added as well as a link but for purposes of the session, we wanted to cover the changes based on the phase 1 PDP recommendations. The first one is—this is better.

The first change here relates to section 3312 and it concerns trademark claims final recommendation too. So here the working group

recommends that the claims notice be delivered both in English as well as in the language of the registration agreement. So here the working group recommends that the language be replaced to state the registrars must provide the claims notice in English and in the language of the registration agreement. So again, that language there was carried over. Language of the recommendation was carried over into the section.

The second part of this recommendation also states that the claims notice must include a link to web page. The org website which contains translations of the claims notice in all six UN languages. As part of that context, the working group had noted that some of the registrars do not translate the claims notice into all of the language. And so, in addition to adding a text on this in the claims notice, which we'll get to it in a bit, we also thought it would be helpful to add a requirement here to make sure that registrars are doing this.

And the next point of discussion really, as no changes have been made yet as a result of this recommendation, the recommendation itself recommends that the current requirement for only sending the claims notice before registration is completed be maintained. However, the implementation guidance here notes that there may be operational issues with presenting the notice to registrants who registered domains to the current 48-hour expiration period of the notice. The working group also had requested that the team consider ways in which the org can work with the registrars to address these implementation issues perhaps by altering the 48-hour expiration period of the notice.

And so, I think this is something that we will need to continue to discuss with the IRT in terms of how to address these issues. Before we can make any further changes. Down below, you will see some updates were made to 3-4-1 and 3-4-2. This relates to trademark claims, recommendation 6, I believe down below. Noting here that updates to the functional specifications are required to support the additional elements described in exhibit A. Exhibit A is the claims notice form.

And then moving on to the claims notice itself. So here, the [inaudible] has taken an initial stab at revising the notice per Trademark Claims Final Recommendation 6. The recommendation here is that the notice should be revised to help enhance the intended effect of the notice by improving understanding of the recipients while decreasing the risk of unintended consequences of the [inaudible] domain applications. The working group also noted that the notice should be revised to reflect more specific information about the trademarks for which it is being issued and to more effectively communicate the meaning of the notice.

For instance, outlining possible legal consequences or describing what actions potential registrants may be able to take. As part of the implementation guidance for this recommendation, it is noted that the claims notice should be comprehensible for those that may be unfamiliar with trademark law. That also, while the notice should be revised, it should also maintain brevity for improved user-friendliness and provide additional relevant information.

And then the working group also suggest where they would be helpful to consider soliciting input from internal or external resources and some resources are suggested down below by the working group. So

with that in mind, we, the IPT has made some revisions here in accordance with this recommendation. We've added this text here on what a trademark includes. This was pulled from a document that was circulated by the working group that was written by IP clinic students.

BRIAN BECKHAM:

Brian Beckham again. I know you're just taking notes and I don't mean to overly wordsmith here but since the goal here is to make this user-friendly, I know technically, when it says name, symbol, device or any combination, that's true. But I think when you start to get into device or any combination, a more kind of user-friendly way to describe that might be a logo or something to that effect because I'm not sure a kind of average person reading this would understand what a device is.

And then when it says trademark includes that has been protected, that's not strictly true. It should just say a trademark includes word name. If you say, symbol, device, logo, whatever. That or which identifies the brand or business whether it's protected starts to get into, is it registered in a national office? Is it common law protection? Things like that. So I think you can get rid of that clause that has been protected. Also, don't forget, you have in the preamble that there's a reference to the Trademark Clearinghouse which presupposes that there's a registered trademark somewhere that is the basis for the entry into the Clearinghouse.

ANTONIETTA MANGIACOTTI: So thank you, that's a very helpful suggestion as we do want to try and keep this simple and easy to understand. So again, we're taking notes

and we will discuss and update the document and also further discuss this with the rest of the IRT members to see how we can improve the language here. This is just kind of a starting point that we can build off of.

ELISA BUSETTO: And Susan, you also had a question.

SUSAN PAYNE: Yeah, I support what Brian just said. Also, just to flag, is there any certain types of marks that are permitted into the Trademark Clearinghouse? So I think to avoid confusing a registrant receiving the notice, maybe we don't need to be talking about symbols and so on because that probably wouldn't be a mark that was eligible to go in the Clearinghouse in the first place. And so, they wouldn't be getting a trademark claims notice for that.

ANTONIETTA MANGIACOTTI: I thank you for that input and also, again I want to remind IRT members that suggestions are welcome and can be made directly in the Google Doc. And again, we will review the suggestions that have been made here during this session to update the language, so thank you.

JASON SCHAEFFER: Hi, this is Jason Schaeffer for the record. I support both what Brian and Susan have said. I think maybe another way to clarify this would be, since this is going to a lay person, if it's not a registered mark, it's not

getting into the Clearinghouse in the first place. So if you're going to make a statement, you just say it's a registered trademark.

ANTONIETTA MANGIACOTTI: Noted, thank you. Following that sentence, we also added some information of what the Trademark Clearinghouse is. That was pulled from the org website and what we have used to explain the meaning or the explanation of what the Clearinghouse is. And lastly, we also added some information here on some of the for instance consequences that could take place if a domain name were to be registered that that infringes on trademark rights.

BRIAN BECKHAM: Brian Beckham again. I know this is working off the existing claims notice but in the middle there where it says, protected as non-commercial use or fair use by the laws of your country. Just in the spirit of readability, it may be just as well to say, may or may not. You might even just say maybe protected as fair use because strictly speaking, whether something is commercial or not isn't necessarily the trigger for whether it's considered a fair use. So I think that might make it a little bit more bite-sized and user-friendly.

ANTONIETTA MANGIACOTTI: Thank you for that suggestion. So that's the changes that relate here to the main body of the claims notice. Further down, we have added some data elements as suggested in the claims recommendation 6 that more specific information about the trademarks for which it is being issued should be perhaps included and might be helpful. So we pulled this

from the Trademark Clearinghouse. Specifically, the information that is submitted to verify trademark records. There may be other data elements as well. These are some of the ones that we thought might be helpful to include. We are open to suggestions, changes and/or removing the data elements that have been included here. But just again, as a starting point, we've added these.

JOHN MCELWAINE: John McElwaine for the record. What is status of the trademark registrant? What does that mean? The third...

ANTONIETTA MANGIACOTTI: So right there.

JOHN MCELWAINE: Okay, I see.

ANTONIETTA MANGIACOTTI: The Clearinghouse guidelines provide an explanation that the status of a trademark holder corresponds to the capacity of the trademark holder that is submitting the trademark record. Go ahead.

JASON SCHAEFFER: Jason Schaeffer for the record again. One point to go back to what we were just discussing where Brian mentioned clarifying and saying fair use, striking out that other language, might also make it a little easier to comprehend that could say maybe a non-infringing use or fair use.

They're not exactly the same necessarily but that's something that someone would comprehend I think if you add that language in.

ANTONIETTA MANGIACOTTI: Thank you. Thank you for that. We will note that and revise the document. Again, the IRT will also have a chance to—the rest of the IRT will also have a chance to review these changes, so thank you. Lastly here related to exhibit A, this goes back again to trademark claims recommendation to I believe about the link to a page where the notice would be available in all six UN languages. Once that page is created, the link will be added there as well.

And then here in exhibit B, which is an example of the claims notice, again, we've included the same language that we covered above. The only difference you will see here is we've added some dummy data to the data elements that have been proposed to be added to the claims notice. And so, this concludes the overview of the IPT proposed changes to the RPM requirements and TMPDDRP rules. If there aren't any questions at the moment, we can move to the next agenda item.

ELISA BUSETTO: We have a question from Griffin, please.

GRIFFIN BARNETT: Hi, Griffin Barnett again. Yeah, just quickly, just going back to the section where we would put the link for the notice and the other UN languages. Just logistically, I mean, does it make sense to have that wording in the actual UN six languages because if somebody is looking

at this in English and not realizing that they can see it in another language, do you see them saying—to actually put that specific sentence with the link in each of the languages? I’m just thinking like, if somebody were looking at this and wanting to find it. I don’t know, that just occurred to me, so just to think about. Thanks.

ANTONIETTA MANGIACOTTI: If I’m understanding the question correctly, I think the link would be to an org web page where then it would be—then we would have the claims notice available in all of the six UN languages or do you mean would we add six separate links to six different claims notices?

GRIFFIN BARNETT: No, I think the link can be the same. I just mean that sentence that proceeds it to say, this is where you can see the notice and all the languages should—you should have that sentence with the link in each of those languages right there because otherwise somebody may not understand that that’s the link to go to that. I don’t know, maybe I’m overengineering this but do you see what I’m saying. That sentence itself should be included here in each of those languages. Does that make sense?

ANTONIETTA MANGIACOTTI: So this was added as part of the recommendation.

GRIFFIN BARNETT: Yeah, I don’t know. Are you not understanding what I’m saying. This whole thing is in English. Does it make sense just here for this sentence

to say, the trademark notice is also available in all six UN languages. See link to actually have that sentence repeated there in each of the six UN languages?

ANTONIETTA MANGIACOTTI: This is something we can again take back and discuss and see how we can revise or make changes based on what you've brought up.

GRIFFIN BARNETT: Okay, thanks.

ANTONIETTA MANGIACOTTI: So next, we wanted to just provide some information on next steps related to this work. I'll go back to the slides. We have one more.

BRIAN BECKHAM: Sorry, Brian Beckham. I agree with Griffin and just the thought might be even that that should be at the top of the document. Otherwise, people might not catch it.

ANTONIETTA MANGIACOTTI: This last sentence here? Okay, thank you. Thank you for that input. So in terms of the next steps, again, we would like to have the IRT review the documents that we just covered and the changes that were proposed by the IPT. We will also go back and review the suggestions that were brought up during this session and make changes accordingly. We would like to give maybe the IRT another week

following the ICANN meeting to be able to take a look at these two documents.

As a reminder, all of these materials will be posted for public comment and following the conclusion of the public comment, we will work with the IRT to review and consider the feedback received. So noting here again that there will be two more opportunities for the IRT to review and provide any further changes. And then, also for the community to provide their suggestions and feedback during the public comment period when that takes place.

The ICANN org will also work with the URS and TMPDDPR providers to complete implementation items. Some of the implementation items—one, this mainly relate to updating the provider's supplemental rules to be in line with what is being recommended. We also plan to look at and close any other outstanding items that are in group one. Of course, we will do so with the IRT. And as I mentioned earlier, we will do one final review about [inaudible] procedural documents before they go out for public comments.

Then the IPT would prepare and publish the materials for public comment. Following the public comment period, we'll consider the input received and update the documents as appropriate. So I think that's all we have for this presentation. If there are any questions or AOB items.

LARS HOFFMANN:

Susan, go ahead.

SUSAN PAYNE: Yeah, sorry. Just wondering what the next steps on the sort of issue that was the outstanding point on the 48-hour expiration pre-registration practice. Is that something that we need to come to a conclusion on and for the purposes of these rules before they go out or is that happening somewhere else? Just wanting to understand what the plan is.

ANTONIETTA MANGIACOTTI: So I think that's one of the—we have compiled a list of the items that require further discussions that are part of the implementation guidance that we maybe need to look into.

LARS HOFFMANN: Susan, was that part of the implementation guidance? Is that right? Do check.

ANTONIETTA MANGIACOTTI: Is it claims recommendation 5 that you were referring to? Yes, it's part of the implementation guidance.

LARS HOFFMANN: Yeah, Susan. We had a conversation with John [inaudible]. Well, you brought a couple of implementation guidance up last time and asked how we're going to deal with those. We took a closer look at those and some of them looked a little bit to us that they might veer into areas where as staff we think they—we'd take the lead right in implementation that they veer potentially into an area where it could be seen as developing something akin to policy. And [inaudible] very carefully. Nobody has made any decisions or discussions or anything.

So what we informally discussed with John is that we're going to put together our thoughts on the various implementation guidance and share that with you guys to see what your thoughts are on that. So we'll make sure that they're being either implemented if need be and then appropriately according to the processes that are in place or if need be, the group and we would all agree that there's an issue that it might not be appropriate for the implementation process to do this. Then we can speak to the councilor about that. What would need to happen with that. It's on our list to do and we'll inform the group transparently as soon as [inaudible]. There you have it. I hope that's helpful.

SUSAN PAYNE: Yeah. Thanks very much.

ANTONIETTA MANGIACOTTI: All right. If there aren't any other questions, I guess we can end the session.

LARS HOFFMANN: Thank you, everyone. Three minutes early.

ANTONIETTA MANGIACOTTI: Thank you.

LARS HOFFMANN: I think my [inaudible] might be over.

[END OF TRANSCRIPTION]