ICANN78 | AGM – GNSO Transfer Policy Review PDP Working Group
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ROGER CARNEY: Thanks, Julie. Welcome everyone. Those in Germany, welcome. Those online, welcome as well. I'm glad everyone made it today, a good turnout today. Get our work done nice and early this week so that everybody can have an enjoyable week. I don't think we have a lot to cover here before we jump into our agenda. As most of you know, we've been working on wrapping up our discussions around bulk transfers, ICANN-approved and any of those others that come through. I think that it's been our focus basically ever since we met last in D.C., I believe. We've done all the work I think that we need to get done. We have one big open item left that I think we'll still need to cover and get resolved. I think we'll move on from those discussions and get into some of our remaining discussions.

For today's meeting, we're going to focus on a few items that we've talked about in the past that we need to make sure we've got resolution to before we move on. Again, I think in a couple weeks when we meet again, we'll go through and do a good review of where we stand through all of our Group 1A outcomes and all of our discussions to that point and then we'll finally move into our change of registrant discussions in November. Before we get there, we wanted to wrap up these few items, make sure we had closure from the group. I think most of these are settled, but we need to make sure we've got them so we can move forward. Before I do that, though, I'll open up the floor as we do for all our meetings to any of the stakeholder groups that want to make any comments, bring any discussions forward that they've been having. So I'll open the floor up to anyone, any of the stakeholder groups. No? Okay. Well, good. I think we can jump into our agenda then. And maybe

I'll turn this over to Caitlin if she wants to walk us through where we stand on these current items before we drive into them.

BERRY COBB: Sorry, Roger, I'm drunk driving on the slides here. I just wanted to also highlight to the group about where we stand project status-wise. So as Roger mentioned, we're trying to exit out of Group 2 so that we can return back to Group 1B, which is change of registrant. Just some where we're sitting today is we're about five weeks behind schedule trying to wrap up Group 2. After that, we'll be doing an overview of where we stand across all of the groups in preparation for going to change of registrant. Finally, just as another kind of side point here, we've had a total of 110 sessions, a few of which have been ICANN meetings. Most of them have been virtual plenary calls. We started this back in February of 2018 of 2021. We're close to 1,000 days duration since we started, with only 165 hours of actual discussion time across all of these topics. And we still have a ways to go. So I think something that's going to be important for the group moving forward when we get into back to change of registrant is we really need to be prepared with the work that we have moving forward. We want to try to expedite moving through that so that we can get to a new initial report to submit for public comment. That timeline based on the project schedule is around, I believe, the end of, the beginning of August. Preferably, we'd like to try to go to public comment before we get to the June ICANN meeting. So maybe end of May timeframe will be helpful, because I think given the size of everything that's going to be included in the public comment, there are still going to be some issues that we haven't settled on, and we're going to need more time in reviewing those public comments to get to the final recommendations and into the consensus call. So thank you for that. Go ahead. Caitlin.

CAITLIN TUBERGEN: Thanks, Berry. And hello, everyone. This is Caitlin Tubergen from ICANN Org speaking. As Roger noted at the beginning of the meeting, there were two outstanding items related to the Group 2 topics that we wanted to address before moving back into Group 1B or Change of Registrant. The first topic is something that came in via a message from ALAC, which Steinar will speak to shortly, but I'll provide a little bit of background before we get into that. This brings us back, if I can rewind part of that 1,000-day duration that we've been moving through these topics.

So Charter Question G3 is in relation to the Transfer Dispute Resolution Policy. That is the dispute resolution mechanism that folks can use to, that registrars can use if they believe there's been a violation of the transfer policy. And one of the things that this working group looked at is if the TDRP as it currently stands is sufficient. Are there additional mechanisms needed to supplement it? And should the general approach be reconsidered?

So one of the topics that the group discussed in relation to this charter question is whether the TDRP should be open to registrant filers and not just registrars as it currently stands. So the group had a discussion about this and ended up with Preliminary Recommendation 1 highlighted on the slide as the relevant portion. I won't read the whole recommendation, but in short, the working group is recommending that the GNSO request an issues report or another suitable mechanism to further research and explore the pros and cons of expanding the TDRP to registrant filers. Can we go to the next slide, please?

So after the recommendations or the preliminary recommendations were finalized with respect to the TDRP, the ALAC had written to the working group to note its response to that recommendation and in essence, it doesn't go far enough in terms of registrant access. If I may, I'd like to turn it over to Steinar if you'd like to elaborate on ALAC's position on this just so that that can tee up the next question that I have for this group. Thanks.

STEINAR GROTTEROD: Hi, this is Steinar for the record. I must admit it is some time ago and we discussed this pretty much at the ICANN meeting in Washington in June. The essence here is that when we discussed this at the Consolidated Policy Working Group, we were, maybe not the best word to use, but we were kind of frustrated that the registrant didn't have an opening to initiate a transfer dispute under the policies that are set in the transfer dispute policy. So this is not a question about using the transfer dispute policy to take back a frauded domain theft or something like that. It's purely under the conditions and the requirements that are set under the transfer dispute policy.

We believe and we kind of have argued in the document that has also been distributed to this agenda is that there shouldn't be any technical issues that the registrant should have that opportunity. Because we will most likely have, we may have a scenario that the sponsoring registrar for a domain name do not support the registrant in issue, initiating transfer dispute policy. And then the registrant only have the option to go to court and I think that's a long shot. That could be costly, that could be, and not particularly registrant friendly, the way I see it. So we kind of stick to this and we want to, if we don't have the consensus and agreement within this working group and this process, At-Large has kind of announced that we will definitely put strong argument into the public face on this one. But I do hope that we can sort this out here and make some sort of arrangement and I hope that the registrars in particular will support the At-Large initiative. There was some pros and cons among the registrars in Washington and I haven't been lobbying. Maybe I should start doing that, I don't know. But that's the status of it is today. So if we stick to the recommendation, there will be comment in the public comment base for that one. Thank you.

ROGER CARNEY: Jothan, please go ahead.

JOTHAN FRAKES: Thank you. I'm not opposed to this in one way or another. I think it's great that registrants do have that agency to speak up. One thing that I note is it's confusing, I think, for many registrants when they find a domain might leave and would want to activate something like this. There are other policies that this, I think, cross plays with, like the ERRP or EDDP. There would have to be some way to kind of untangle so you don't end up with a lot of reports falling into this category where they may be misfiled. So some way to ensure that this is, in fact, about transfer and not related to expired domains or whatever the ERRP stands for. It escapes me because I don't have more coffee in me. But these things can be confusing to a registrant and so it will be important to untangle that. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Steinar, please go ahead.

STEINAR GROTTEROD: yes, this process, the transfers, is in general kind of confusing for the registrant. You have to – there's a lot of different things that you have to have knowledge about to kind of understand that. So it is always a responsibility, at least the way I see it personally, is for the registrar, the sponsoring registrar, for a certain domain name to educate and to guide the registrant in any of his or her problems and questions. In this case, I will find it more reasonable that the registrar, even though they don't want to put this question into the transfer dispute, if there is no legitimate reason for doing that according to the transfer policy, they have a very good argument and then they have to educate and explain that to the registrant. So, but again, it is complex, but the thing here – and that's the bottom line, actually – is that we want to have this opening and I honestly believe it won't be used that much because it's not about sorting out domain theft, etc. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. Before we get to the rest of the hands, maybe I'll have Caitlin run through the slide that kind of lays out the options and proposals that we can take with these, and maybe that helps those with their hands up, but maybe Caitlin, please go ahead.

CAITLIN TUBERGEN: Thanks, Roger. Again, this is Caitlin speaking from ICANN Org. So after we received the letter from ALAC, we discussed a little bit among the leadership were some options that might address this concern that would be in scope for the working group to discuss. So what you see on the slide are some proposals for the group to consider, and before I get into those options, I just wanted to quickly note that when we introduced the topic earlier, we had noted that this particular question was addressed or at least discussed by the IRTP Part D working group approximately five or six years ago. That group ultimately decided that they didn't want to overload the TDRP and so made the decision not to open it to registrant filers, but nevertheless, it had been scoped. So if the group did decide to make that decision, it would be within its remit.

So a couple of the options to address the question or the concern from ALAC would be in the event a registrant is requesting that the registrar file a TDRP and the registrar does not proceed with that, at a minimum, the policy could require that the registrar provides a written rationale to the registrant explaining why it refuses to file a TDRP, and that reason could very well be it doesn't believe there's sufficient evidence proving that a violation of the transfer policy occurred.

The second option could be to allow the registrant to be responsible for the fee required by the TDRP provider. This suggestion was in recognition that some registrars believe it's cost prohibitive, especially if it's not a very clear case of a transfer policy violation. Third, the group can consider opening up the TDRP to registrant filers, and again, this would mean the registrant would be responsible for the payment of the fee irrespective of the outcome. This would operate similar to other dispute mechanisms in existence at ICANN, such as the UDRP, and in this case, the registrar involvement would be verification of data similar to how a UDRP works today, so the provider would ask for certain information, when was the domain name transferred, who's the domain name holder, etc. The group could also say thank you for this input, but we believe we should leave the recommendation as is, or we have the bullet for other options that our leadership team may not have considered that some creative individual or working group member could bring to the table, but we thought this would be an opportunity to discuss that letter in person and see if anybody had any thoughts on this. So I'll turn it back over to Roger.

ROGER CARNEY: Thanks, Caitlin, yeah, and maybe just a reminder for those that don't look at the TDRP often or handle these, using the TDRP is a very specific case in that the policy had to be breached somehow. Most of the time when a domain moves, the policy is either followed or it's not moved. I mean, generally, the policy gets used correctly even when a domain gets moved fraudulently, so it's one of those, it's tough, and I think from a registrar and a registrant standpoint when they have those discussions, I think they do believe, okay, yes, there was an issue, but it's not a TDRP issue, and I think that's where a lot of that comes up, so anyway, I just wanted to remind everybody that using the TDRP is very focused on just following the policy and not for theft or anything like that necessarily, so, but Volker, you've been very patient with your hand up, so I will go to you.

VOLKER GREIMANN: Yes, I think if you recall my comments when we had this discussion a while ago, I feel that there probably should be some way for the registrants to make a transfer complaint simply because of the fact that the TDRP currently assumes that there is a beef between two registrars about the implementation of the policy, but transfer complaints are not always that. The TDRP is very much focused on that, so I'm not quite convinced that this is the right tool, but I am convinced that there needs to be a venue for registrants to contest the transfer simply also because of the fact that both registrants might be uninterested parties in the conflict because transfer policy, in effect, has been followed. There has been some other deficiency that is outside the transfer policy that is hard to evidence between registrars that registrars might not have the evidence for or be willing to take on the risk of filing and losing such a TDRP, so I ultimately think that there should be such a process. However, we would need to consider who would be the other parties in that. So the registrant files a TDRP, but does he file it against the gaining registrar? Does he file it against the losing registrar? Does he file it against the new registrant? So there's a whole lot of considerations that need to be followed, and I think that's absolutely something that we should investigate, maybe not us, but that should be investigated down the road and that should be made policy going forward.

ROGER CARNEY: Great. Thanks, Volker. Yeah, and just to follow up on that, I saw a lot of head shakes as you were saying that, and I think that's where the discussion took us to creating that preliminary recommendation was I think there was a general feeling within the whole group that, yes, that sounds like it needs to happen, but the TDRP is probably not the spot for it to happen in. So I think there's definitely support here for a registrant vehicle, just not using the current one. So Rick, please go ahead.

RICK WILHELM: Just largely echoing Volker's comments there. But one of the things that from a registry perspective, we would have concerns that if the TDRP gets cracked open, it gets substantially worse than it is now. Like right now the TDRP, as you pointed out, it's super targeted. Did the participants involved follow the policy or did they not? It's really super targeted. And so from a registry standpoint, if that thing gets broken open and starts to get rewritten, we would have substantial concerns that it would be substantially expanded. And so we would rather that some other mechanism that Volker's contemplating, hypothetically, that allow some venue or tool or something like that, as opposed to redoing the TDRP because the TDRP is pretty good fit for purpose. Thank you.

ROGER CARNEY: Great. Thanks, Rick. And again, I think hopefully Steinar hears that there's support for the concept of expanding to a registrant vehicle. But I appreciate ALAC bringing that up. And if they can provide comments during public comment, I think that'll just help the preliminary recommendation that much more, too. So Berry, please go ahead.

BERRY COBB: Thank you, Roger. I'm Berry Cobb for the record and sharing my screen. And for some reason, I can't find my raised hand. I think one other reason why this is circling back is from our Group 1A and Group 1B discussions where we kind of have this connective tissue about either the proposed post-transfer restriction or disputes that may arise out of the current policy of core and whether that remains intact. And so bullet number three here is really already accounted for. That is the recommendation that the group has on the table. But it's the first two that I think the leadership team is interested to get more input on from the group as a potential interim measure until we can go through an issue report, spinning up a new PDP specifically on an RNH access to some transfer dispute mechanism. And Volker rightly pointed out, it's a spaghetti bowl of issues that are going to need to be accounted for, which we've already understood that this group is not scoped to do, let alone may not we all be the best people to do it. So recognizing, as I pointed out, we're approaching 1,000 days. We've passed 100 calls on this. It's easily going to be three plus years, maybe more, depending on how urgent this issue is, before some kind of solution becomes available. So really given the dependencies that we identified in the other two groups, is there something that we can do as an interim solution before we can try to get to that target solution? Thank you.

ROGER CARNEY: Great. Thanks, Berry. And I think maybe see that on both sides of it. Do either one of these, both of these bullets help solve or at least get us part way? And is it feasible? I think looking at it both ways, does it provide at least a step in the right way? And is it feasible to do from this working group's point of view? So thoughts on those two bullets? Steinar, please go ahead.

STEINAR GROTTEROD: Yeah, and this is Steinar for the record. First of all, to my knowledge and memory, I don't think that At-Large has discussed some sort of fees connected to this. But I do find it logic that if the fee is being set and well-known announced to the registrant, the registrant has to take the decision whether they want to follow it, follow the process, if you have the opening to enter the transfer dispute policy, according to the terms set in that one, and have to actually weigh pros and cons whether they want to go on to that. But I think the essence here is that the fee should be transparent and should be well informed by someone. And there's also kind of a question about who should the dispute be against. That's something I must admit, I haven't taught it that way, so that has to be discussed within being of a group. But the similarity to the UDRP, where the panel kind of set some parameters on who's right, who's wrong, can we go further on, etc., I think that is something that can be used in this way. But I think the essence here is that the fees and the cost involved for the registrant has to be known. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. And I guess my only thought on the fee part is it seems to make sense to allow a registrant to activate this. My biggest concern is, for the most part, the registrar knows if it's going to end up being correct or not. So that's the only reason they choose to pay the fee. So I think if, to me, the concern would be if a registrant says, well, I want to pay the fee, and we make a policy change that allows that, the registrar already knows that the TDRP is going to fail because they know the policy was followed. And now they're going to say to the registrant, well, you can pay the fee if you want to. And to me, the concern is, is that going to create bad blood or whatever from the registrant's standpoint? The registrar knowing fairly comfortable that it's not going to work. And again, I'm not saying not to do this. I'm just saying that that would be a concern on my part. Others' thoughts? Jotham?

JOTHAN FRAKES: Yeah, thank you, Jotham Frakes. So the thought there, maybe just to plus up what you're saying, is that the registrar in the case that somebody might be filing, the registrant might be filing, is going to be the registrant or the customer or client of what would be called the former registrar. And the domain will have already left. So their ability to really do anything is diminished just by the sheer nature that the domain is no longer under the sponsorship or control of that registrar. So that's where we would know or have a better basis for understanding if there was a success rate or potential pass or fail. Maybe just wanted to plus up what Roger was saying to help give more context to people listening to this. Thank you.

ROGER CARNEY: Great. Thanks, Jotham. Catherine, please go ahead.

CATHERINE MERDINGER: Thanks, all. This is Catherine Merdinger for the record. I think, Roger, what you were saying is a really good point that the registrant is not likely to fully understand the transfer policy and the obligations under it. I think if we give them more access to the TDRP as it is, I think they're likely to end up paying fees and losing over and over and over again. I think we need to have a mechanism, maybe like Volker was talking about, that's not specifically, maybe it's more tied to how do I get my domain back in this some kind of transfer something happened that's broader, which I think maybe is what Rick was suggesting, that's broader than just the transfer policy failed because I just, I don't think that registrants will fully appreciate the transfer policy enough to understand when they're likely to win and lose. And if you just lose, and if you just get a bunch of registrants that keep losing these things, they're likely to get upset that there's not a process to do what they want this process to do, which is to help them get their domain back, whether it was stolen or hijacked or something else that might be in line with the transfer policy but is not in line with what they wanted to happen with their domain. Thanks.

ROGER CARNEY: Great. Thanks, Catherine. Theo, please go ahead.

THEO GEURTS: Thanks. And this is Theo for the record. So when I'm looking at this process, which is similar to the UDRP, I mean, if I'm looking at the UDRP, one thing that I always notice is that there's a bunch of lawyers always involved in these things. So I think when you're talking about the TDRP, I don't think a registrant will go just go in there, pay $1,500 without some legal backup here. So if the question, if the process is sort of, yeah, opaque, I'm not sure of that. I think that you cannot say like, oh, this is a win and this is a lose. I think basically the registrant needs to consult with some legal advisory people to even file a TDRP. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Owen, please go ahead.

OWEN SMIGIELSKI: And I guess thanks, Rick, for summoning me in the chat there. For those who don't know, when I was a law student, I wrote about this new thing called the UDRP. So it goes back a long time and it's a large basis of my career. But I think that while we might want to, we have the incentive maybe to try the UDRP or modify that, I think we should leave that separate just because it's about trademarks and it has a number of things, things you have to prove based on trademark rights. And that has nothing to do with whether or not somebody's domain name was transferred without their consent. So I think we should do something, have a venue or that avenue for registrants to pursue something, but it should be a separate standalone, perhaps modify the TDRP or something else or create something new, but leave the UDRP to trademark stuff. Thanks.

ROGER CARNEY: Great. Thanks, Owen. Okay. Any other comments? And again, I think Berry interjected here and was looking for thoughts on these. We've talked a little bit about the second bullet, but how about the first bullet and that if a registrar, and again, I think we've talked about this during our discussions, registrars don't initiate a TDRP per se. The registrant contacts their registrar and says, hey, something happened. And then that goes from there. So is it bullet one here, is this a realistic add to, maybe if the registrar says, no, hey we're not going to file a TDRP and we're not going to pay the fee and all this, at least provide back an email or letter or whatever it is to the registrant that requested this, the specifics on why they don't feel that this works? And I think as Caitlin mentioned, it could be fairly simple in that the process was followed. TDRP is not going to result in anything being done except for a fee being paid. And maybe here's a course of action that you can take or something like that. So, but Steinar, please go ahead.

STEINAR GROTTEROD: Yeah. Hi, this is Steinar for The Record. Maybe I'm on very, very thin ice here, but I actually think that it's not necessary the registrar should provide this documentation to the registrant. It should be the panel that should do that. The panel should contact both the registrars involved and get whatever needed data they find to make a decision. And because if there is lack of support with the so-called sponsoring registrar for a domain name in dispute, I don't see that the registrar will have the willingness to give all this data. It's in my eyes more logic that a panel set the criteria to get what sort of data should they receive to put that into their decision making process. Thank you.

ROGER CARNEY: Great. Thanks, Steinar. I think maybe trying to draw a line here, these options on the screen were in lieu of our recommendation basically or added to our recommendation. I think the recommendation is probably going to create a panel and those rules and everything would come out of that if that was pursued by the council. Option one or two here, and again, maybe they're both valid, is something to do in the interim because we know if we go with a recommendation, which I think everybody's agreed to because I think everybody says there should be a registrant path here, we know that that's going to be a multi-year process to get to a conclusion, and the question is, is can we add in something today that will be still probably a year away from now or two to get implemented, but that would be sooner than a process just being started in a year or so? Again, I think the question is, should we? Can we add language that forces a registrar to explain why they turn the GERP down? And again, this is for that interim step between now and when council decides to look at this in a full effect. Go ahead, Rick. Thank you.

RICK WILHELM: Thank you very much, Roger. One of the things that I think that we need to be careful about when we think about this is that there's two situations that arise here. One is when a transfer is, the person filing is grumpy about the fact that it moved between registrars, and then the other fact is you can be grumpy because you think you've lost your name, right? And those two, to Catherine's point, and also to your point, that TDRP is about did you execute the policy, and you can be grumpy on both of those things? And I think that when the concerns that Steinar is reasonably raising are somewhat orthogonal to kind of both of those points, before we sort of trot too far down this notion of an issues report, which is work, right, for staff and things like that, we also need to consider the broader scope of this whole effort that we're doing. Remember, we're talking about right now inter registrar transfers. One of the things that's hanging in the back of my mind is this whole effort. Also, there's part of this, which is inter registrant transfers, which I personally don't believe belongs anywhere near this, but that doesn't matter because it is what it is. But there's going to be a whole new kettle of very different smelling fish around that, and there's going to be a separate set of discussions about arguments about that. And I think that before we sort of march forward with something like this, we might want to hold this sort of a recommendation in abeyance because there's going to be a harder set of discussions and disputes around whatever that part of the situation is. So that's something to maybe consider before we sort of start running this one up the flagpole and sort of spin work on it. That's something that we should consider. I'm not saying that the concerns here aren't real, but we might just want to wait before we start work. Thank you.

ROGER CARNEY: Great. Thanks, Rick. And I think it gets back to Volker's discussion about all the parties being involved and how someone said spaghetti, and it's like it does get to the—And to your point, Rick, that's going to be another piece of that spaghetti puzzle, is if it's just a intra registrar transfer that's just registrant to registrant or however that works, it brings up that additional issue. So again, we'll obviously finish all of our discussions and look at all of our recommendations in a whole once we complete change of registrant. So thanks for that, Rick. Volker, please go ahead.

VOLKER GREIMANN: Yes. I mean, introducing a new policy is probably beyond the scope and would explode our timeline significantly and delay any other outputs that we have already developed and worked by significant amounts that we probably would not want. I was just thinking that currently the registrant only has the ICANN compliance route to complain. And maybe there could be some lightweight wording that would expand on the registrar's obligation to investigate and provide information to the registrant, the registrar to provide information to the registrant when faced with a transfer complaint from a registrant that says that a complaint is provided or has occurred against their will or wishes. And that would open the route for the registrant to go through ICANN compliance for such cases and obtain that evidence so that they could use that through legal process or other processes that might be invented down the road. But that already would enable the registrant to get information more quickly and that would probably not take that much of our time.

ROGER CARNEY: Great. Thanks, Volker. Berry, please go ahead.

BERRY COBB: Thank you, Roger. Berry Cobb. And picking up on Rick's point, if we're not careful, we're going to get into circular dependencies here. So I'm specifically looking ahead for our Group 1B topics, change of registrant. And you probably haven't reviewed the materials yet, but when we did that high-level overview while the Group 1 stuff or used to be Phase 1 was in public comment, the group had momentum about tearing down what is a material change for a change of registrant. You know, we didn't get to any final conclusions, but there are a lot of components that are listed in the current policy where those changes are made that was directly connected to what Rick was talking about, which is a dispute for a change of registrant, not a change of registrar. And at the time when we put that matrix together to dismantle some of those major components on what's considered a material change, the idea or the rationale to be able to take those down is, well, then the registrant needs an ability to still dispute a particular domain that they lost. And we know today that registrars, by and large, take care of these internally. And when it doesn't happen, there is this avenue to court, to a legal mechanism, which I believe is what Volker was touching on. And perhaps that is something that the group can explore, again, as a stopgap measure, because this working group has hung its hat on trying to dismantle the core stuff, but we still need access to some dispute mechanism. We're not really going to have a dispute mechanism for three-plus years. Is that going to be enough for the group to be able to get to consensus, to revise, change, remain status quo of change of registrant, which again ties back to our group one and specifically the 30-day post-transfer restriction for an interregistrar transfer change. And I'll close with this because the existing part of the policy that nobody seems to love is the 60-day restriction on those material changes for change of registrants. So that's all the connective tissue that is surrounding how we got to here. And we got to here because we thought, well, registrants can have access to the TDRP. Now we've uncovered, well, that's not really a good idea because it is a very focused aspect. Now we need a different mechanism. So I'll stop there. Thank you.

ROGER CARNEY: Great. Thanks, Berry. Jothan, please go ahead.

JOTHAN FRAKES: Yeah. And as we, maybe it's a good segue into the COR conversation, change of registrant, or intra registrar transfer, as Rick referred to it. This is the place that I really feel is spring-loaded and really conflates the issues around EDDP and ERRP I mentioned earlier, is when you're looking at change of registrant because that often may affect or appear to a registrant if some form of a deletion process or other thing happens and how a registrar is handling that will show in some cases as if it is a intra registrar transfer. So that might be confusing to a registrant who doesn't understand what's happening with respect to how those other things are unfolding. And so this part, I think, is where we really need to be aware of how would a registrant know the difference between where EDDP or ERRP kicked in and is this something that I can dispute or is something going through its natural life cycle because I didn't pay or how those things interplay. So it's going to be an interesting and an important place that we focus and not let a registrant be confused by those things. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Okay. Any other comments on this? Again, I don't think we're finished with this, obviously. I mean, we've obviously went around here and seen that we're probably going to touch back on this as we go through our phase one or group 1B stuff. So I think good discussion here. Again, I'm trying to see where everybody stands here, but I think once we go through the change of registrant process, we'll have a better feel for this and what this looks like. So again, I think we'll circle back to it. So no other comments or questions. I think I'll turn this to Caitlin to take us to the next up.

CAITLIN TUBERGEN: Thanks, Roger. The next topic is something that we discussed again a while ago. So I'm going to need everyone to go back into their memory bank for this one. There was one outstanding item with respect to recommendation 27, and this is from the EPDP Temp Spec phase one recommendation, which is currently on the screen. In short, this was the recommendation that noted that all of the recommendations in EPDP phase one would mean substantial changes to registration data. And as a result of that, the working group recommended that the consensus policies that touch on registration data should be reviewed to ensure consistency with those phase one recommendations. And there is one outstanding question with respect to the transfer dispute resolution policy, and one of the things noted by the ICANN Org team that provided an update on rec 27. So we can go to the next slide.

So ICANN Org delivered an impact paper which went through the policies in detail and pointed out a couple of things that may need updates due to EPDP phase one recommendations. So the one that's on the screen, again you may remember us discussing this a while back, but the way that the TDRP is currently written provides that when a panel reviews the information provided by the registrars, it is required to compare that information to an authoritative WHOIS database to confirm the accuracy and reach a conclusion based on that. Obviously now there is not necessarily an authoritative WHOIS database, most information is redacted, and so a panel is not able to independently confirm that information. And so ICANN org noted in its paper that there is no clear analog for an authoritative WHOIS database in the new registration data policy. Can we go to the next slide?

So in that impact paper, our colleagues have pointed out a couple of potential options. The first is that similar to a UDRP, the panel can request certain information, or excuse me, the provider can request certain information from the registrant or the registrars, which will be provided to the panel so that there would be information related to that registration data, or requirements could be written at a higher level so that there's no need to go to an authoritative WHOIS database. We included both options in the updated draft TDRP and asked for comments, and there were no comments, which very well might mean that everyone's okay with the updates that staff made, but we just wanted to present those one more time and ensure that they're okay with the group so that we can close out this issue. So if we can go to the draft TDRP. Hold on, I'm going to send the right document to share. Apologies for the brief delay. If we can scroll to right above section 3.2, this is the first update.

So in that fuchsia color is the potential added step, and that was a suggestion from Org that rather than having the panelists check an authoritative WHOIS database, the provider will submit a verification request to the sponsoring registrar, and the verification request will include a request to both lock the domain name and also provide the information of the current registrant of the name. And then if we can scroll down again, just a little bit lower. So you'll see that a lot of the text has been crossed out. The way that the TDRP is currently configured has the panel checking for FOAs. Was the correct FOA sent?

Does it match what's in WHOIS? And some of the updates to the transfer policy as a result of EPDP phase one make that impossible. And some of those updates beforehand, like sending the gaining FOA is no longer a requirement. So what we did to update the policy is to note that rather than have all of these steps with the panelists having to verify all of these specific things, the panel is being asked to determine whether a violation of the transfer policy occurred using the documentation provided. And then a little bit later in the policy, it notes that if the panel doesn't believe that a violation of the policy occurred and thinks information is missing, it has the option to request additional information from the registrars involved. So I guess the registrar would have another chance if there was a missing piece of documentation that the panel thought might be necessary to make its determination. But anyway, that's how we chose to address it in the language and would appreciate if everyone could have a look at that and make sure that the lack of comments was because everyone's okay with that language and we could just proceed. Or if when I presented this earlier everyone was put to sleep and forgot to look at it and that's really what I'm concerned about because I know it's not the most exciting of topics. But we'll send a note around just to with a link to this to make sure that it's okay. It's pretty straightforward, but again, I just wanted to make sure it didn't fall through the cracks.

ROGER CARNEY: Great. Thanks, Caitlin. Any comments on these? I know some of you may have not have read it, but I know Sarah did and she's probably already forgotten about it by now. But any other comments? As Caitlin said, she'll forward this around. So Ken, please go ahead.

KEN HERMAN: Yeah, hi. Ken Herman for the record from Noncommercial. Yeah, I have been following all of this in detail, but we do have some concern about that correct data is being transferred from place to place and where does this authoritative data actually exist currently? And I think there's maybe some lack of confidence that the registrar actually has the correct data that might be in place. I don't have an answer as to how to overcome that. I just wanted to raise that it is a concern of ours. Any kind of transfer of data, especially since a lot of it's redacted now, and we're grateful for that, introduces these kinds of challenges. So I just wanted to raise that as an issue from our perspective. Thank you.

ROGER CARNEY: Great. Thanks, Ken. Caitlin, please go ahead.

CAITLIN TUBERGEN: Thanks, Roger, and thanks, Ken. In response to that, I just wanted to note that if you want to have a look at the evidentiary requirements that the registrars would be filing, that's a little bit earlier in the policy, and you can see if there's anything in there that is a particular concern. But yeah, that's where I would draw your attention to because that would be the data that's being transferred.

ROGER CARNEY: Great. Thanks, Caitlin. Okay. Any other comments on these? Again, I think Caitlin will send it around, but we're assuming this updated language here works for everyone. But again, the concern was that there were no comments, so we just wanted to make sure that that was true. But no other comments? Caitlin.

CAITLIN TUBERGEN: Thanks, Roger. Shortly after this meeting, you will be receiving a document from us, and that is a recap of where we are currently. And by that I mean before we return to the change of registrant topic in Group 1B, a couple of you had noted, I don't even remember what we agreed to in Group 1A, much less Group 2, which is the more recent topic, and that's a very valid concern since, again, Berry noted we've been discussing this for almost a thousand days at this point.

So with that in mind, what support staff tried to do to refresh everyone's memory is highlight all of the changes and the draft recommendations that we've agreed to thus far, so that the group remembers what we have agreed to to help inform its discussion of Group 1B. And so we're not going to present on all of those today. Our plan is to distribute the documents along with an updated swim lane that Berry has created that includes all of the updated recommendations. But I thought we could, if we did have extra time, which we do, cover some of the recommendations in Group 2, which again is the most recent topics that the group has covered. The TEAC, the TDRP, and then the ICANN approved transfers. One note on the ICANN approved transfers. Last week, those recommendations are now in a fairly stable condition, and so we're closing those off for now. But yeah, without further ado, we'll quickly show you the general format that you can expect to receive. So all of the recommendations that the group has agreed to will be included in their entirety to help jog everyone's memory. But we don't intend on reading them all verbatim and putting everyone to sleep. You'll see that the important point, or at least what we deemed to be the crucial part of the recommendations, are bolded and italicized. And then underneath the recommendation, there will be a short blip about what the recommendation means. So using this as an example, for the transfer emergency action contact, the group agreed that the four-hour response time frame was too short, and that should be extended to be 24 hours or one calendar day. And so underneath, it shows there's a timing change to the requirement, four hours to 24 hours. Next slide, please.

So the next preliminary recommendation about the TEAC is that the current language of the policy noted that communications to a TEAC must be initiated in a timely manner. The working group wanted to make that a little bit more specific and notes that the initial communication to a TEAC is expected to occur no more than 30 days following the alleged unauthorized loss of a domain name. So there's now a timing requirement there, and we note underneath this recommendation that it's a new registrar requirement. Next slide.

The next recommendation on TEAC also adds a little bit more clarity around timing. So once the first response is provided to the registrar, the registrar must provide substantive updates by email at least every 72 hours or three days until work to resolve the issue is complete. So I know that there's that first response within 24 hours, but until the issue is ultimately resolved, there needs to be subsequent updates every three calendar days.

This was a recommendation about how that communication needs to occur. The initial communication needs to be either in the form of email or if there's a designated phone number, and then that email will start the clock for the 24-hour response time. This is just again adding additional text around the current TEAC requirement.

This slide shows that at least currently in the process, part of the TEAC discussion led to, okay, we have the TEAC as a mechanism to resolve issues with a transfer, but should there be a fast undo mechanism or a clawback mechanism also added to the transfer policy to resolve transfer-related issues? The group did discuss this. There was a small team that worked on drafting the process of how informal resolution currently works today, and whether that should be something that's added to the transfer policy as requirements. However, after that group presented the process to the full working group, the majority of the group said informal resolution seems to be working well today without it being added to the transfer policy, or thought that perhaps adding it to the transfer policy might add complications, and accordingly did not agree to add that to the transfer policy.

Next is a recommendation refresher on the TDRP. This should look familiar because we actually just discussed this recommendation, but the working group discussed the potential of adding registrant filers to the TDRP, but for many of the reasons discussed at the table today, that it might seem on its face to be simple, but in reality there's a lot that needs to be discussed with respect to potentially opening it up to registrants, and also as noted around the table today, that many of the issues that registrants come to registrars for are with not necessarily violations of the transfer policy, and accordingly the TDRP would not be the appropriate dispute resolution mechanism to address a lot of these issues.

So the group is recommending that the GNSO request an issue report to further look at these issues since that it's not something that is simple. We might need specific types of experts to be involved. So I guess the answer to that charter question was at this time the group's not recommending opening it up to registrant filers, but believes further work is necessary on this topic.

Then with respect to the TDRP, you all just saw the draft updated TDRP, and references to WHOIS have been changed to match what the new registration data policy has as its terminology. That has all been redlined, and we've gone over it with the group. I know Sarah had made some comments, so thank you, Sarah. This is pretty straightforward, just textual changes to account for updated language and the new policy.

These should look familiar, or at least more familiar than the other recommendations, since this is the topic we've most recently been covering. But you'll notice there's some new fun icons attached to the recommendations, and I'm sorry I'm to blame for this. But when we're going through these recommendations, there's always been some confusion because we're talking about two types of bulk transfers. One being when a registrar is transferring all of its names versus a BTAPPA or a portion of names. So you'll see that the first number one shows that the farm icon is to show when a registrar is transferring all of its names, or a farmer is selling their entire farm. And as I've told my colleagues, I have a one-year-old child and sing Old McDonald on a very regular basis, so that was why we have cows on the screen.

So in addition to a registrar selling its whole farm, or transferring its whole farm to another registrar, it might be that an RRA is being terminated or a registry registrar agreement. So a registrar in this example, when you see the herd of cows, is no longer raising cattle. It's still operating its farm, and it might have pigs or sheep or crops, but it's no longer selling dot example names. And so that still falls under an ICANN approved transfer. And then lastly, number three, with the one single cow, that is a BTAPPA or a partial portfolio transfer. And so when we were looking at the charter questions, the first charter question is specifically in relation to the sale of a whole farm, all of a registrar's domain names, or all of its cows, to denote that it's no longer operating under a certain TLD. The cow is, the registrar is still operating and offering all the same TLDs, but a portion of those names are now moving as a result of a BTAPPA, which is a service that some registries offer and allow, but ICANN has no approval of those. They just, ICANN approves a registry to offer that service, and then registries and registrars coordinate amongst themselves if a registrar would like to use that service.

So now you'll understand why there's cows and farms next to the next set of recommendations that, as I noted, should be very familiar to the group, because we've just been discussing these. But the first preliminary recommendation, again, this is a full portfolio transfer, is that the registry operator may charge a fee. That's a change to the current language, which says will charge a fee. And that the registry may waive the fee associated with full portfolio transfers, except in cases where the full portfolio transfer is resulting from an involuntary registrar termination. In those cases, the registry must waive the fee. Oh, yes?

RICK WILHELM: These look good, Caitlin. Just a full disclosure, I was in the Google Doc during the prior meeting, and I thumped a comment in there that in, like, Rec 1 and Rec 2 that are coming up, it would be good, I think, to do some editorial work around the context of these recommendations, just on the wording of them. Because if you look on the screen, it says implement a, here on the text, just what one reads, if this text gets copied and pasted from the Rec, it says full domain name portfolio transfers. I think it would be good either to specify that it says implement an ICANN approved full domain name portfolio transfer, or have some language which refers to the fact that this is in the context of an ICANN approved thing. Because what's going to happen here is that these recommendations, once the greater we publish them, they are going to get thrown into blog posts, copied and pasted, and all this stuff. And the context here, that we are all working so hard to preserve in that, in this case, your headline, ICANN approved full portfolio transfers. We have full domain, but we don't say that it's ICANN approved because of these reasons that Roger knows in his head. And so I think that editorially, it would be good to really work to make sure that when this text gets pasted, people know ultra clearly that this is not BTAPPA, that it is ... So completely agree with what we said here. It's almost like it's a drafting thing, as Owen would say from back in his law school days, that sort of thing. Thank you.

CAITLIN TUBERGEN: Thanks, Rick. I think that's helpful and a good suggestion, and we can definitely do that. So preliminary recommendation two for ICANN approved transfers. Again, this is full portfolio transfers. This was from a suggestion from the working group that we want to make clear that the number of names and the price ceiling are status quo. They're staying the same and wanted to make that clear in the text. But also note that the change is that the group talked about how when the text about this fee was created, the domain name landscape looked very different. And accordingly, now there might be 45 registries involved in one of these transfers. But rather than have $50,000 times 45, which would be cost prohibitive, the recommended ceiling of the collective, all of these registries cannot exceed that 50,000 US dollars. And it must be apportioned based on the number of domains transferred. And we have a note here, please see recommendation three through six for further information on how that apportionment is supposed to look. And that's because it shouldn't be just to know it shouldn't be read in isolation.

So the next recommendation is that recommendation about registry operators need to provide notice to registrars of any fees associated with these transfers upon request and prior to the initiation of the full portfolio transfer. And I see Rick's hand is raised.

RICK WILHELM: Yeah, hand again. So again, I was in the document this morning. So due to Rec 2, we've changed the way that this mechanism works. Previously, it was possible that the that the fees would be something. But now there's a hard cap on the fees to the gaining registrar of 50,000. There's no way that the registrar is going to get a bill for more than $50,000 full stop. There's no fee schedule for these ICANN- approved transfers. It's fixed, right? There's nothing. I would offer that given the sequencing of the discussions and understand how Rec 3 got on the paper, but given the way that the discussions have unfolded, Rec 3 is, as I would say, overcome by events. And I would table respectfully to the group as, I think it's a friendly amendment, to drop Rec 3, because I think that the notice requirement is—I won't say that it's burdensome, I would say that it's silly, and that the registries are going to end up giving a notice to say, here's the schedule, and that the thing is going to come and it's going to hit Sarah's inbox, and she's going to throw it into file 13, and it's going to be a requirement for everybody that doesn't make any sense. And so I would suggest that we [no op,] that we delete Rec 13, because there is no more schedule anymore. And from the registry standpoint, if for some reason Rec 2 changes, and the fee schedule starts to become variable again, we'll gladly bring the concept of a notice back. I don't care. But right now, I think this is silly for both the registries to be sending it and all the registrars to be getting it. I think it's a waste of everybody's time. So I would ask that the group reconsider and drop Rec 3, because I don't think that it's a good use of our time. Thank you.

ROGER CARNEY: Great. Thanks, Rick. Yeah, and it's interesting. You're right. I think how this came about is kind of, as you said, kind of overcome by events, because we went to, I think what's Rec 2 is, not changing basically the language. It's 50,000 domains, $50,000. Otherwise, it's nothing. And so the variable nature of that has disappeared only to the extent of apportionment, because that's a lower variable. But that has nothing to do with actually announcing a fee, because it won't be dictated by that. So I think that's a good call. And if others don't disagree, I think that makes sense. Jothan, please go ahead.

JOTHAN FRAKES: It seems to me that if the proposal would be to not have Rec 3 as it is, then Rec 4 may not be actionable. By my logic, like if you're saying you're not going to tell us what the fee would be, then changing it wouldn't matter.

ROGER CARNEY: Yeah, I would say Rec 4 still applies, and that the problem is you're apportioning it based on a percentage of domains. So if someone drops out with 50%, everybody else doesn't get to raise theirs by 50%. So I think 4 still applies and can be used, but just my thoughts. But Rick, please go ahead.

RICK WILHELM: Registries are still good with Rec 4. We're not abandoning Rec 4. That was not, I never said that, never implied that, not touching Rec 4. Thank you.

CAITLIN TUBERGEN: So in reference to Rec 4, the purpose of Rec 4 was that the registrar would be paying no more than $50,000, but in terms of how that $50,000 is apportioned is based on the number of domain names transferred.

And this is to note that in the event a registrar chooses we're going to waive our portion of that fee, the other registry operators are not able to up their fee suddenly to make it $50,000 or make it add up to $50,000. They're still only able to charge the registrar for the portion based on the names transferred. And then recommendations five and six deal with the ICANN involvement. The group had talked about how ICANN could potentially be involved. So once the full portfolio transfer occurs, the registry operators need to provide notice to ICANN that the transfer has occurred and the notice needs to include the number of domain names that were transferred. Following receipt, that gets us to recommendation six that ICANN would send a notice to the registry operators based on those reported numbers and send the corresponding percentages and then the registries can bill the registrar under those percentages. And then I believe this is the last recommendation.

CATHERINE MERDINGER: Sorry, I had my hand up. I was waiting patiently. I was just thinking according to their schedule, is that the right language? Because it's not the registry's schedule, right? It's the whatever. Otherwise, sounds great. Thanks.

CAITLIN TUBERGEN: Thanks, Catherine. We'll make note of that change because that is correct. And then lastly, this is just confirming what's already a requirement, which is the gaining registrar is the entity that's responsible for paying the registry's fees if there is a fee. Okay. And now we're moving to the single cow BTAPPA recommendations. So the first recommendation here was a suggestion from the working group or some members of the working group that BTAPPA, the boilerplate really needs to be expanded to account for additional circumstances. Specifically, where an agent of the registrar such as a reseller or service provider WHOIS acting under the authority or on behalf of the registered nameholder elects to transfer its portfolio of domain names to a new gaining registrar. And apologies for reading that verbatim, but we've added language specifically to account for different concerns of working group members. So that's opening up the BTAPPA to a new type of case.

Preliminary recommendation two is an update to boilerplate language. I believe the current notice period is 15 days if I'm not mistaken. It's being changed to one month. And that's to notify the affected customers that their names will be moving so that they have a grace period to move their names elsewhere if they don't approve of this change. Sarah?

SARAH WYLD: Thank you. Where it says by X date if desired. Anytime you see an X date, I get emotionally triggered nowadays. So should that perhaps be before the transfer occurs? Where are we going with that? Are we going to before? So let's try to fill that in before we finish. Thank you.

CAITLIN TUBERGEN: Thanks, Sarah. We'll make note of that as well. I'm sorry. I see a question from Steinar and Owen just answered it. But yes, no, these are not approved by ICANN. ICANN approves registries to offer the BTAPPA service via the RSEP. But in terms of the transfers that occur within BTAPPA, ICANN has no involvement currently in that. Steinar?

STEINAR GROTTEROD: Hi, Steinar for the record. I was just confused by the headline here that says ICANN approved transfers in brackets. And if you copy pasting things, it's not ICANN approved. It's just cosmetic. Thank you.

CAITLIN TUBERGEN: Thanks, Steinar. We'll change that so it's not confusing. So preliminary recommendation three, this is a confirmation of existing BTAPPA boilerplate language. And this recommendation would go into the report if the group ultimately decides that BTAPPA should be added to the transfer policy. Otherwise, this is just a confirmation of status quo. But it just notes that when a BTAPPA occurs, expiration dates are not affected. So there are no fees involved and there's no grace period to reverse the transfer.

Recommendation four also is a confirmation of existing BTAPPA boilerplate and that allows registry operators to reject BTAPPA requests in certain instances. And that's gaming, avoiding fees, etc. Yes.

RICK WILHELM: So I'm a little, I guess, I hate it when people say this, I'm a little confused. So this is, ICANN-approved transfers, which I thought were, it says ICANN-approved transfers at the top.

ROGER CARNEY: That was Steinar's comment as well. This is a single cow typo here. So just think single cow here. This is not ICANN-approved. This is BTAPPA stuff.

RICK WILHELM: Got it. Okay. So on the BTAPPA stuff, I guess maybe we're farther along than I thought we were, because like one of the things about BTAPPA writ large is we've been talking about trying to get the, about the macro language, about the overall language change, and we hadn't really kind of come to an agreement on that. And to me, saying that we've got recommendations about all of the stuff, about any of it, when sort of the macro thing around the language is hanging open is, like, I'm uncomfortable providing agreement on this other stuff when, to me, the language is kind of the linchpin. When I say the language, it's about sort of the scope of what the boilerplate BTAPPA is. Also, the fact that we haven't really come to an agreement on is BTAPPA part of, at least I don't think we have, is BTAPPA going to be required or not? And so, while I think it's important that we kind of talk about these other things, and from a registry standpoint, we're not really opposed to, for example, the stuff in Rec 3 that's up on the screen here about there's no—But sort of saying that we're agreed on all that stuff when the biggest issues, to me, are still open, unless I've been chemically imbalanced more than I realize ... So, can you offer some comments on that about what the status is of the overall discussion? Thank you.

ROGER CARNEY: Thanks, Rick. Yeah, and actually, when we started writing these recommendations weeks ago, maybe months ago now, we agreed that

that language, if it's going to be BTAPPA, which is optional for registries to support or not, or if it's going to be policy, these recommendations don't change. It's just where they change. So, either these recommendations are going to go into the BTAPPA boilerplate template, or these are going to go into a policy language. So, it seemed like as we went through these, everyone was agreeing things to do except not gaining to the spot of where to do them. So, I think that is still an open question. That's our biggest open question. Actually, I think our only open question for bulk transfers now is if this language goes into BTAPPA boilerplate, or are we putting all this into policy? That is our last and only open question for bulk transfers. But again, I think all of these still apply either way that it goes, and the group coalesced around these ideas no matter where that was at. So, hopefully that helps, Rick. Go ahead.

RICK WILHELM: Okay, so you would sort of call these like building block recommendations such that, assuming we get to some point we would sort of slide it, there are some almost like pre-preliminary recommendations. I'm waving my hands. I'm not asking you to change the slide.

ROGER CARNEY: No, no. And again, I think that no matter where it goes, these are our recommendations. So, that one decision of flipping it one way or the other doesn't change any one of these recommendations. And I think that the easy part for the group was, hey, everyone agrees these are great things, now we just need to agree on where to put them. And that's either going to be in the boilerplate or into policy, which again is our open question. And we are down to two minutes. Thanks, Berry. So, I don't know where you want to draw the line here, Caitlin.

CAITLIN TUBERGEN: I can do the last three recommendations at turbo speed. So, the recommendation five just notes that relevant agreements need to permit this type of transfer if the registrar is going to use the BTAPPA service. And preliminary recommendation six will look familiar. This notes that registry operators may charge a fee for this type of change, single cow change, but must provide notice to registrars of what their fee schedule looks like prior to the initiation of the transfer. And then lastly, preliminary recommendation seven notes that the gaining registrar must not impose a new inter registrar transfer lock following this type of transfer. And that's noting that this wasn't a registrant-initiated transfer. And accordingly, those locks that typically apply would not in this instance. And then the last thing I'll say about this is everyone should be receiving the whole deck of slides, which also includes group 1A and group 1B where we are now. And our hope and request is that everyone reviews those in advance of the call where we go over them, just so that you're a little bit familiar. And if you do have questions or concerns about the way the recommendations landed, you can bring those up as we go along. But I'll turn it back over to Roger.

ROGER CARNEY: Great. Thanks, Caitlin. Yeah. And again, as Caitlin mentioned, there's a lot more of this coming. So this was a good sample of where we're at. But the remainder is going to be coming in the hopes that, yes, everyone takes a read of it and at least is on the same footing as we step off into talking about the change of registrant coming up. And Berry wants to say a last word.

BERRY COBB: Yeah. Just real quick for that homework. So our next call is November 7th at our regular scheduled time. But when we send out the package and staff preparing this, I went back and listened to the call from January 17th. We'll include a link in it. And that's where we did an overview of the swim lane. And I've made updates since that. I strongly urge you to listen to that call and review the swim lane, then go to this recommendation text and everything will be in much more context. If you go straight to this recommendation text, you're going to, how did we get to there? And so I think that'll be helpful. Thank you.

ROGER CARNEY: Great. Thanks, Berry. Any other comments or questions before we close out? We are at time. And everybody's ready for lunch. Thank you, everyone, for showing up today and everyone, including those online.

[END OF TRANSCRIPTION]