
SAN JUAN – ccNSO Members Day 2, Part 4
Wednesday, March 14, 2018 – 15:15 to 16:45 AST
ICANN61 | San Juan, Puerto Rico

UNIDENTIFIED MALE: This is ccNSO Members Day 2, Part 4. We will be running from 3:15 through 4:45 on Wednesday, March 14, 2018 Room 209BC.

KATRINA SATAKI: Okay, good afternoon. We are ready to start this session, [inaudible] consultations with the ICANN Nominating Committee and it's my pleasure to welcome here – how many are there? Great to have chair elect. Damon, please, may I give the floor to you and brief us?

DAMON ASHCRAFT: Thank you so much, Katrina. My name is Damon Ashcraft and I am the chair elect of the 2018 Nominating Committee. I want to thank you so much for allowing me to come to speak to your group today. It's a real pleasure to be here. By the way, the party last night that we were both invited to for the party with a purpose, I thought that was a fantastic idea, so I'm glad our leadership could arrange that. That was great. Had an opportunity to speak to one of your members, Stephen, last

Note: The following is the output resulting from transcribing an audio file into a word/text document. Although the transcription is largely accurate, in some cases may be incomplete or inaccurate due to inaudible passages and grammatical corrections. It is posted as an aid to the original audio file, but should not be treated as an authoritative record.

night and we had a real good conversation and I'm real excited to be here today.

I want to talk to you a little bit about the Nominating Committee this year, where we're at in the process, and also to make a plea from you for more information, and in addition for candidates because we're in our recruiting cycle.

With respect to ... Let me talk a little bit about the Nominating Committee structure. The Nominating Committee structure itself is made up of a chair, which is Zahid Jamil. He sends his regrets. We're running a little bit behind schedule, so I've been sent in his absence today. The chair elect, which is myself. Then, there's also the associate chair.

Then, we have seven members from the GNSO, one from the ccNSO and that's Pablo. I believe Pablo might be here today.

KATRINA SATAKI: Definitely was. Maybe now he's with you.

DAMON ASHCRAFT: And I will tell you, Pablo is doing a fantastic job representing the ccNSO. He is just a joy to work with, so thank you for sending him to the Nominating Committee. He's a great guy and a great representative.

Five people from the ALAC, one from the ASO. We have a non-voting spot for the GAC on the NomCom. I say spot because they've never sent us anybody. I guess they have some internal issues they've got to work out before they send us somebody and they have yet to do so and I'm not optimistic that they will do so in the near future, but it is what it is.

So, let's talk a little bit about the spots we're filling this year. We've got three members for the Board of Directors, one on the GNSO which is a non-voting seat, two for the ALAC, and two ccNSO seats. As you'll recall, last year, we did have some difficulty filling the ccNSO seat and I think that was ... As I'll talk about a little bit later in the presentation, there was a result of frankly just some bad communication between our different groups and I think we have fixed that and we'll look forward to better communication and selections that better suit your needs as we go forward.

Let's talk a little bit about gender balance and gender diversity within the applicants. We have often been criticized as far as not appointing enough women and people will look at the composition of the NomCom and say it's mostly men and they're just appointing men.

Well, let's look at some stats. Basically, as you all know, we can only draw from the pool of applicants that we have. In 2016,

when – we’ll just use the Board, for example. We appointed two male board members. We had 19% of our applications were women. Last year, when that pool went up to 36%, we appointed two female board members. So, I would just encourage people – gender diversity is important. In an ideal world, we’d have about a 50/50 split on the board and throughout all the organizations that we fill that would be equally balanced if we could get there.

When you’re out talking to people about applying for one of these leadership positions, specifically encourage women to apply. That is important. Also, ask us. You don’t need to be salespeople. That’s our job as the Nominating Committee. We are responsible for recruitment. So, if you know of a good candidate for any of the positions, including your own, and you need some help from a Nominating Committee member as far as describing the positions, describing process, get us involved and we’re happy to have a phone call with you, meet with those people. I’ve met with several different candidates throughout my time here in Puerto Rico. Please contact us. We definitely want to help you do that. It kind of goes over the slides that I went over for the overall candidates. I have to confess I didn’t draft this presentation. Zahid did. I’m kind of pitch-hitting for him today. So, if I sound a slight bit disorganized, blame it on Zahid. Just kidding.

Here's who's currently on the board. The board members that are highlighted in yellow are the ones that have terms expiring. With respect to the two members that we're going to be potentially filling their seats would be Lousewies from Europe and then also [Rico] from Latin America. Both of those board members are eligible to reapply if they so choose. Then, in addition to that, George Sadowski is going to be term-limited, so he's going to be leaving the board.

Pay attention ... One of the things that we have to do when we look at board seats is pay particular attention to geographic diversity. We cannot have anymore board member ... We can't have anymore than five board members for any particular region. It's my understanding ... Well, we have to have at least one and no more than five. Basically, for three board members, there's no limits this year, but from a practical reality is that we're probably ... We can't put three new board members from North America. I suspect Europe is going to be close to that five number as well. So, just keep that in mind.

Most important thing. How do you apply for one of these positions? The application is done in a two-step process. The first is you submit basically an expression of interest. There's the URL for that. That apparently takes ... One candidate told me it took her ten seconds, so it's pretty quick. Then, after you do that, you are then given access to a Wiki application platform,

and entering all the application, the Wiki application platform will take more than ten seconds, probably a few hours. You have until the 19th to express interest and to the 26th to actually fill out your application. I would encourage you, if you're going to apply or if you know someone who's going to apply, apply early. Don't wait until the last day and risk any issues with that because there is a hard cut off.

Let's talk a little bit about where we're at on the timeframe. Basically, right now we're obviously at ICANN 61 in San Juan. What we're going to be doing is over the next few months we're going to be assessing the candidate applications that we receive. Then, in the Panama City meeting in June, we're going to be having interviews with candidates and we'll be making our selections in the Panama City meeting.

Let's talk a little bit about some of the improvements that we have made to the NomCom this year. I will tell you that at Zahid's request and his urging and his drive, we've changed quite a bit this year. One of the problems that we were having with NomCom is that all of our budgets and a lot of the decisions that affected us were already set when we were basically seated. So, Zahid refers to that as Groundhog Day, so we [were seated] at the last day at Abu Dhabi, and at that time, our budget was set and all of the others main decisions from staff that gave us flexibility to move things around, it was basically already pre-

determined for us. The number of assessment firms was set. Recruitment firms were set. We didn't have many choices.

So, [inaudible] some of the things. Recruitment firm, budget, assessment firm, the schedules, the meetings, operational planning all set. The budget for 2019 has already been created and submitted, so that's going to be an issue for the next NomCom.

So, what have we changed? We have done a forced budget reveal. We have been pretty persuasive with ICANN staff and we have gotten a portion of our budget revealed to us and that's been very helpful. We also have retained a second recruitment firm to help us recruit qualified candidates. We have changed the assessment firm. And a significant change is we are having a face-to-face intersessional meeting in early April. That's going to be a significant change for the NomCom.

The way it used to work is that we would get the applications and a first cut, if you will, would be individual members of the Nominating Committee, approximately 17 people sitting at home or in their offices by themselves sifting through probably 100 applications. Each application was five to six pages long, and people would pretty much by themselves sit and then rank candidates, and those rankings would result in a lot of people being cut out of the pool.

We did not think that that was real wise to do it that way. It was simply cumbersome and the best way to describe it to people is when you're sitting by yourself making a decision, you lose the ability to function as a committee because we didn't have other people to bounce ideas off of. We didn't have people that maybe knew the candidate. We just thought that it was a counterproductive process.

So, what we've done is we've arranged to have a face-to-face intersessional where we're going to be meeting in person and we're going to be sifting through the applications that way. That should result in a much more thorough process. And I want to mention with respect to the intersessional meeting, I know budget is of paramount concern to everybody. We took the money for our intersessional meeting out of our existing budget and made other cuts. So, NomCom this year is not costing more than NomCom last year because of the intersessional. I wanted to mention that.

We've also drafted a job description to the board of board candidates and that was shared with the board. We got their feedback and we have that available.

The general criteria is going to be based on job description, quality and skills, and then board guidance. We talked about the intersessionals. We have two recruitment firms.

Another criticism that we've heard about the NomCom is that it is a black box where people apply for positions and they never hear back. That's not fair to the candidates and frankly it's rude, to ask somebody to apply for one of these leadership positions and not to hear back or not to hear the status of their application is not – the communication with the community and to [inaudible] community what we wanted.

So, what we've done this year or what we've resolved to do this year is that we're going to be providing feedback to candidates at various stages along the process to let people know generally where they're at.

In particular, if a candidate does not make a cut or if they're in a position where they're not likely to be invited for an interview in Panama or they're pretty low ranked, we're going to be communicating to them, "Thank you for your application. It does not look like you'll be moving on in the process." That way, they'll at least have a little bit more communication from us.

Another thing that we've done is we are visiting with folks as yourselves and the other advisory committees and supporting organizations. We want to know a little bit more about what you're looking for in candidates. We've sent letters and we have met with a lot of folks in person and we want to hear from you.

Other things we've done is we've done formal interview training. We had a group come in, a professional recruitment firm, come in yesterday – actually, two days ago – and give us formal interview training which we've found to be very helpful. We've had confidentiality training, board governance training, and training at each of the AC and SOs.

The final thing is – I realize I'm getting close on time, so I think this will be sufficient for our presentation today and I'll take questions – is that we had a due diligence process that was just frankly backwards. What happened in previous years is that we would make our selections and then we would send the selected candidates off for due diligence. Then, if due diligence came back positively, the announcement would be made.

That's why we would go to a meeting in June, Nominating Committee would meet, and you wouldn't hear anything for two months until September is because of this due diligence process.

So, we have sped things up and we're going to do due diligence on our short-listed candidates before Panama. Then, we'll make our selections. Once we've confirmed that the candidates that are selected will accept them, which we suspect they will, then we'll be making our selections.

Will you find that in Panama? Maybe. I tend to doubt it, but you should find out pretty quickly thereafter. I think that will be a major improvement.

I see that the boss is here.

KATRINA SATAKI: Too late. Sorry.

DAMON ASHCRAFT: So, what I can do is turn this over to Zahid to finish it up if you'd like to finish it up or we could just take questions if you want.

ZAHID JAMIL: Sure. Thank you. Well, we've done this presentation several times and this is how lackadaisical we are in the NomCom. No, just kidding.

So, we've changed this process where we basically do due diligence before the final interview and that helps in making sure that when we make a decision – for instance, this time in Panama – it is done. There is no double or second-guessing about it.

Our website used to be constantly changing every year, so people had difficulty trying to get to it. Now we have

nomcom.icann.org which is static where all the information regarding the application will be and it is.

We have also hardcoded and this is very important for the ccNSO because of what happened last year. We have hardcoded in our operating procedure that we will send letters every year to every AC and SO including the ccNSO asking for guidance, so that when we get that letter, we make sure that we don't do something that becomes a problem like happened last year. So, that's I think the most important thing and we've learned from our experience last year, and particularly in the manner that you helped.

Let me just say the way in which you interacted, and Katrina obviously that you interacted with us, was very helpful in explaining things to us. Also, Pablo has been an extremely valuable member of the NomCom this year, so we really appreciate your input and your understanding with our process. Thank you.

The last thing we've done is we've changed a certain process in the sense that we had term unlimited liaisons and we had term-limited voting members, and there was a problem where basically that we made sure that people who don't have a vote don't get to decide the fate of a candidate.

So, we're enforcing the bylaws strictly this year, that voting members are the only ones who basically get to select or deselect a candidate. That's the end of our presentation. Any questions, maybe?

KATRINA SATAKI:

Yes. Thank you very much. Our next session is very, very exciting about GDPR. I really would like to thank you for taking our needs on board. It's really important for us and we appreciate this collaboration that clearly now we're talking. That means a lot. At least that's the first step. Any quick questions? Yes, Roeloff? And by the way, for our community, the ccNSO Council have submitted our requirements to the NomCom and they have acknowledged the receipt.

ROELOFF MEYER:

Thank you. That was an interesting and comprehensive presentation. I have two questions. Did I understand you correctly that NomCom members are going through hundreds of CVs for a single vacancy?

ZAHID JAMIL:

Just to be clear, we have at the moment, we've got in the order of about 90 or so complete applications for all our positions. It

isn't clear yet how many are just for the board or for the ccNSO, etc.

ROELOFF MEYER: Okay. But, you work with short lists.

ZAHID JAMIL: Absolutely.

ROELOFF MEYER: Your recruiting firms provide you with a short list.

ZAHID JAMIL: Let me very quickly tell you how that works because all the NomCom members want to be able to input on who is or is not going to get selected. What we are doing is basically doing a rating of all the applications. Everybody gets to rate the applications one to five. A scoring is created.

ROELOFF MEYER: Hang on. I just want to find out if you ask your recruiting firms to provide you with a short list.

ZAHID JAMIL: We do.

ROELOFF MEYER: Or if you [confront] the NomCom members with the complete list and all the CVs of everybody that applied or both.

ZAHID JAMIL: Both. Let me just clarify, if you allow me. We are trying to get an evaluation [firm] this year and it's a budgetary issue, to be able to help us basically provide a short list. ICANN staff hasn't confirmed yet whether that entity is going to be able to assist us in that evaluation process, although the discussion with them is that they will give us their short list and those candidates they feel are going to be the most appropriate. And this is only for the board. That's what the evaluation [firm] is going to do.

Separately, the entire NomCom is going to basically rate all the applications and then sort them from 100, for instance, down to 40, down to 20, etc. This is how it's been every single year. No NomCom has allowed the evaluation firm to deselect candidates because it's also a bylaw issue.

ROELOFF MEYER: Well, it might be an interesting bylaw to change then.

ZAHID JAMIL: Oh, I agree.

ROELOFF MEYER: It's a very inefficient process. Okay. Second question. How often have you experienced that you selected a candidate, did the due diligence, and then had to pick another candidate?

ZAHID JAMIL: That's precisely why we've changed the process this year. It happened last year.

ROELOFF MEYER: So, the answer is once?

ZAHID JAMIL: We don't know what has happened in previous years because every year is confidential, but it did happen. I was chair elect last year and we had to ... There was a problem last year and that is why we're changing it this year. I can't speak for the years before that.

ROELOFF MEYER: Because to me, also, that seems quite inefficient.

ZAHID JAMIL: And that's why we've changed it.

ROELOFF MEYER: [inaudible] the change.

ZAHID JAMIL: So, can I clarify what's happened? Ordinarily, when you select a candidate and we've done a final selection, we used to send that list to legal in ICANN for due diligence. Just like you said, if supposing there's a red flag and there was a criminal history or something with that person or some other issue, maybe government controlled or other affiliations, the problem would've been that it comes back to us saying, "Sorry, this person doesn't qualify." Then, we don't have a date to meet or what do we do next?

And because of that problem that you've just highlighted, this year we've changed our process and said it is only due diligence cleared people in the last slate in Panama that we will interview.

So, once we make our selections, the due diligence doesn't need to take place. It's already done.

ROELOFF MEYER: Yes, I got that. To me, again, that bit sounds a bit inefficient because now you have to do due diligence for multiple candidates for a single vacancy every time. Now, if you pick the

crux every time, then this is a good procedure because then you make sure that among those that have passed through due diligence, there must be at least one that can be appointed. But, if it rarely occurs that your selected candidate fails the due diligence, then having multiple candidates go through due diligence for every vacancy is inefficient because of money or time or both. And it's also a problem that rarely occurs. That would be my point.

ZAHID JAMIR:

That's a valid point, absolutely valid point. The challenge has been that once we make our decisions, say for instance in Panama, there is no process or opportunity or budget for us to meet again, and the cost of actually meeting again or doing that – which by the way we couldn't do – would have been a lot more expensive.

Also, just so you know, that this year when we are sending these to due diligence, we are not spending more money. Our budget, the way it was in the beginning of the year, is exactly the same. We haven't actually changed any extra money. We've had to find money within our existing budget to do all of these things. So, there's no extra money being spent here.

ROELOFF MEYER: Okay, I have to stop. Thank you.

KATRINA SATAKI: Thank you very much. Sorry, we have to stop because everybody anticipates this discussion on GDPR. It's really a very interesting thing.

As anyone who has served on NomCom will tell you, it's a lot of work. It's really a lot of work, so thank you very much for doing that and thanks for coming. Thank you.

So, Peter and Debbie, the floor is yours.

PETER VERGOTE: Right. Good afternoon, ladies and gentlemen. Welcome to the legal session. We are going to do something novel here, a topic you've never heard of before, GDPR. That will [inaudible], although it's called legal session, we're going to try not to be too legalese. So, it's not going to be a lawyers run through the GDPR, so don't start running to the exit doors yet.

Basically, what we want to do is provide a practical look on GDPR from a perspective how it's going to impact you as a ccTLD registry operator.

And because all of our European colleagues are already sufficiently, I would hope, aware of GDPR, what we want to

achieve today is create awareness for ccTLD operators that are actually beyond the European territory because the field of application of the GDPR is so large that, in some way, many of us are going to be impacted by it.

As you noticed, I am not alone. I have the assistance of my co-chair, Debbie, and there is a reason for it because I'm also going to present, so for efficiency reasons, it's better that we have two co-chairs, I would say.

Also, I might be a bit bias because I'm from the European side. Debbie is not, so you will have absolute GDPR neutrality, so to speak.

This session is built up in two chunks. I'm going to kick it off with five slides, a brief introduction to set the scene on GDPR. Then, Debbie is going to take over. If you have any immediate questions that we can address before we go in the second bit, which is the perspective from three specific registries. We have two from outside Europe. Crystal is going to give us a bit of the flavor of how things are going on within dot-CO. Stephen is going to show us how he's dealing or suffering with GDPR from a dot-AS perspective. And I'm going to give you a bit of insight how far we are with our preps for GDPR and what's going to be the main impact and try to give you a few key takeaways, what you could do as a registry to prepare. So, if you're all in agreement,

that's what we have to offer. Well, I suppose we can start with the brief introduction unless you want to add. Is there something/

UNIDENTIFIED FEMALE: Very good.

PETER VERGOTE: Good. Okay. Excellent. Thanks. GDPR, here we are. As you know, there is a mitigal date, 25th of May. That's about two months from now, so doesn't provide much time anymore. As I said, the major takeaway for GDPR is that its impact goes far beyond the territory of the European Union.

First of all, organizations outside EU or EEA space will also be impacted if they offer any kind of way services to EU customers. It could be private individuals, but to a certain extent, also legal entities.

Second reason why the impact of GDPR is massive is because it has a clear, significant impact on gTLDs. You've probably heard already a lot about the calzone model that has been discussed here in detail the last couple of days. If there are changes to be made in the G space, we are going to have a spillover in the CC space.

Thirdly, GDPR is rapidly developed itself into a kind of standard for new privacy regulation. I wouldn't be surprised if it gets embraced by other jurisdictions and being transformed into national legislation which could then, in its turn, be applicable to you as a CC.

So, what we want to address, above all other things, is WHOIS. Why? Because it makes your data processing visible. A lot of your data gathering, data processing, is happening interior. It's not so visible for the outside world. But, if you're using WHOIS, that is what makes you visible and that is the first thing that will raise concerns or complaints, so that should be your primary focal point.

There is also a bit of fake news concerning GDPR. One of the things that I have been hearing for long is that the effect of GDPR is I can't process registrant content data anymore. That's not true. Not true at all. The other thing is from now on, or from 25th May onward, I will need consent from all my data subjects to continue to process their data. This is also not true, and by far looking for consent as a legitimate ground is going to give you a lot of headaches and you should avoid it. This is going to become clearer in the next couple of slides.

We also have a reference case that is pretty important, I would say. I don't know if you're aware of it, but actually the thing that

really kicked GDPR concerns in high gear for ICANN was the opinion of the Dutch DPA which was linked with questions and requests from dot-FRL which is a geo gTLD in the Netherlands.

The basics of that opinion of Dutch DPA was that they very clearly had a massive problem with the current WHOIS, as for gTLDs. What was also obvious was that the Dutch DPA did not have that much problems with the fact of data processing by a registry operator.

Once again, it explains the big difference between your database where you store, at least if you're a thick registry, where you store the contact details of your registrants and other contact handles and the output of that database being your WHOIS.

So, this slide, it might look a bit lawyerish because it has lots of words on it, but I tried to grasp the most important things of GDPR in this one slide. It says that for processing personal data, you need legal grounds. Now, consent of the data subject is the most obvious one, but it is also the most obvious one to try to avoid because consent means in GDPR terms it can be retracted at anytime. You, as a ccTLD operator, you do not want to depend on that.

So, try to look for other legal grounds for your data processing and you have a number of them. It can be the performance of contract. If you are a ccTLD operator and you have terms and

conditions that need to be accepted by a registrant, then you have a contractual relationship and you can process data because probably it's necessary in order to perform the contract.

You can process data if it's for protecting of vital interests. Suppose that the registrant has become a victim of a technical issue. If you're going to reach out to that registrant to alert them of them, you are trying to protect a vital interest of that registrant.

Legal obligation is not so much of application [inaudible]. Maybe a few of you would have specific legislation that actually obliges you to process certain data, but it's going to be rather exceptional.

The most important one for us, why we can or we see a reason for processing data is legitimate interest. Legitimate interest for third parties for the registrant or even for the registry itself.

So, that's about legal ground. Now, for processing data, the goal needs to be explicit, specific, and legitimate. Plus, the data you are processing needs to be accurate, relevant, and adequate. And, the processing needs to be limited and secure. So, all this is actually spanning probably the majority of all the articles in the GDPR.

So, besides those two, what is very important already now but certainly in the future is that you need to inform your data subjects of what you're doing and you need to inform them of their rights. We are going to touch on that later, but privacy by design and default is one of the novelties of GDPR is going to become crucial.

Last slide. So, these are a bit of takeaways that you could do as a ccTLD. Have a register of your processing activities. Make sure that everybody in your business environment is aware of GDPR and privacy protection. Make or create a privacy policy. Have it easily accessible on your website. Even if you do not have to, I would advise you to create a DPO, a data protection officer, equivalent because he will be or she will be your single point of contact to deal with privacy.

Implement privacy by design and default. Check your activities in a sense if you're exporting data outside to non-protected territories. Check your contracts with your suppliers. Prepare for a data breach. And last but not least, be very responsive for requests of your data subjects in terms of privacy. Sorry for running a bit late, but this is actually for setting the scene.

DEBBIE MONAHAN:

Thanks, Peter. To be fair, you did start late, so it's not totally on you. That was a really good overview, and as Peter said, he is

European and it is expected that every European registry is well familiar with this and is even sicker of the acronym than anybody who's come this week to ICANN. I'm not. I'm from New Zealand, so I find it very interesting when Peter talks about the far reach of this piece of legislation.

All our registrants and registrars are bound through agreements which say that they're committed to New Zealand law and any court proceedings that take place in a New Zealand court. So, to me, this is a great example of a piece of legislation from one country and what impact does it truly have.

Down in New Zealand, we specifically tried to limit everything to New Zealand. I think it's an example of the cross-jurisdictional issues that keep coming up more and more in the Internet world.

Now, as Peter laid out, you're going to hear shortly from him, from Crystal, and from Stephen how they're actually operating and how they're planning to deal with this. I've been [inaudible] by saying that I don't think it should really impact us and I suppose I'm lucky enough, I can come from the position that New Zealand has [inaudible] in privacy laws, which means if our privacy commissioner has basically signed off our approach, then it's likely that we'll meet the European things, but there would be a lot of people in this room that aren't in that position.

So, before we hear from the three speakers, we want to open it up to you to get your issues and concerns that you would like to see addressed in the presentations to make sure that when they actually do talk they cover off any questions you might have at this point. Are there any specific issues that you'd like to see the three of them cover off? Liz?

LIZ WILLIAMS:

Thanks very much, Debbie. Thanks, panelists. Liz Williams, dot-AU. So, we're right next to Debbie, as far away from the European Commission as you could possibly be. Now I'm not speaking on anyone's. The questions I'm going to ask are personal questions that I'd like to have addressed.

I've been working in the Internet privacy protection of individual privacy since 1997, so quite a long time. It's an issue very dear to my heart.

What I wanted to get more of an understanding of is whether leaving aside the acronym of the GDPR, leaving aside the requirements of the European Commission, leaving aside the burden of implementation that many, many, many people have to bring into place by May, would you as panelists think that the approach to the protection of privacy as a matter of principle is well-manifest in this approach to privacy protection, whether it's called GDPR or anything else?

For us, in Australia, we have very strong privacy law. It's a well-settled law. Do you think that this is an improvement for registrants at the end user level to enable their data to be adequately protected for lawful collection and then lawful extraction if something starts to go wrong?

So, the real question is, leaving aside the label of GDPR where it doesn't apply and there are many of us in this room where it does not, is it a useful approach to protecting individual privacy at a level of principle?

DEBBIE MONAHAN:

Thanks, Liz. Anybody else? Otherwise, what I suggest we do then is start with the three. What we're going to do is have all three presenters just go and complete their presentation. Then, we'll have more questions at the end. You recall Liz's question, so at the end of your presentations, if you could cover that off, too. Peter?

PETER VERGOTE:

Thanks, Debbie. I'll try to address Liz's question first before diving into my presentation, so that I do not forget to do it in the end. My general answer to your question would be, yes, it's an improvement for the private individual. Private individual in the broad sense because if we're speaking about private individuals,

we think about you and me, but it also applies for employees in a legal entity, in a corporation, in a company.

Also, if you use private individual in combination with a legal entity, they're under the angle of GDPR as they are under current legislation, actually.

I think it's good because it reinforces a bit rights that are already there, but it enlarges them and it puts them in a more modern perspective that's more apt for our current times and it introduces some new things that are, to me, key fundamentals and that is privacy by design which actually means if you start creating a new process or rolling out a new service or whatever kind of creative process that you have, that from the very beginning, you should already do an assessment what is going to be the impact on the level of privacy, just like you do risk analysis if you're [ISO] certified or you're doing a legal assessment or a cost assessment before you say, "I'm going to give the green light to go ahead with this project." Well, we will need to apply the same line of thinking.

So, from that perspective, I think yes. It's not going to ruin the way how we run our business, but it's going to oblige us to reflect more profoundly on the use and processing of personal data. Enhance. It will better protect the rights of the private individual.

UNIDENTIFIED MALE: I would just like to add something as a food for thought. GDPR applies to individuals on the territory of the EU, regardless of whether they're citizens of the EU, temporary residents, or even just in transit that means that I as a Serbian citizen – Serbia is not yet a member of the EU – I register some [dot-RS] domains in Serbia and I'm not protected by the GDPR.

However, if I'm [inaudible] on Frankfurt airport for six hours waiting for a connection, I register a few [dot-RS] domains from Frankfurt airport, for those domains, I am protected by the GDPR. Just put that ... Why am I saying this? I am afraid of GDPR trolls – those who intentionally create situations in which they can not actually go through the whole process but blackmail, in our case, ccTLDs. This is just one example that came to my mind based on that wording on the territory of the EU because all of us mostly think it's about the protection of EU citizens. No, anybody on the EU territory even those in transit. Thank you.

PETER VERGOTE: It just adds to what I previously said. It's like an [inaudible] grasp of GDPR among all of us.

So, our first concern obviously when we started thinking about GDPR compliance was what to do with our WHOIS. Instead of

reading what's on the slide, I'm going to try to make it more visible.

This is a WHOIS record for a [dot-BE] domain obviously owned by private registrant. You see in the registrant field that it's already different from the classic gTLD WHOIS as it currently is or even in [BE] terms it's different from what we show for legal entities, because for the registrant, we only show e-mail address and language choice.

Now, what will change in future? In future is that for registrations of private individuals, we are not going to show anything anymore. The few data that are in there will go. E-mail address for obvious reasons because it's personal data. Language code, not because it's personal data, but if that's the only element that you're showing of the WHOIS record, it hardly has any functions. So, we are going to replace that with a contact form that's going to enable to set up communications, but I'm going to explain that later.

Second change is that for all other types of contacts, and we use onsite contacts, technical contacts and a registrar contact, basically those are supposed to refer to an organization, so a legal entity. So, we are not planning on removing organization address, phone, etc., but in order to contact the legal entity, you do not need the name of a private individual working in that

organization. So, we are going to remove the first element you see there, name.

Now, let's go to a registration made by a legal entity. Here you see that the registrant is a legal entity and you have all the details, contrary to the previous records I showed you – that was the one of a private individual. Now, here, as I explained, the only thing that we are going to change, that we are not going to show any longer, is the name of the contact person within that company.

If you go further down, that registration record, you will see that for the registrar technical contact, for instance, you see that the name has been anonymized, but if it would not – it will go anyhow because obviously we are not capable of seeing the content of each record, so this whole field will just go.

So, if you take away the e-mail address, one remark that immediately came up was, but what in case if I want to contact the registrant? You're going to take away the only tool I have to contact the registrants.

Well, what we are going to provide is a link to a contact form. This is just a dummy. It's still under development. It will set up a communication gateway without revealing the e-mail address of the private individual.

Are we going to allow free text? No, because actually, we as a ccTLD operator, we are going to be involved. We are going to be the facilitator for the communication. So, if for instance, person A wants to contact a registrant and he fills in I don't know what kind of problematic contexts, I as a ccTLD operator, I do not want to take liability for that. So, it's going to be predefined reasons why to contact a registrant. That could be to notify the registrant that there are legal problems, notify the registrant there are technical problems or indicating an interest, for instance, in taking over the domain name, things like that. But, it's going to be predefined.

Another problem that came up is, okay, so you're going to further close down your WHOIS. What if I have legitimate reason to get access to it? Will you provide me with tiered access? That could be questions or requests coming from law enforcement agencies of course, but also registrar certification authorities. There is a variety of entities that could be interested.

Now, that generates one problem because ICANN is clearly on a thinking path of having tiered access where you can get bulk access to the data in your database. I consider this to be highly problematic because it's utterly not compliant with the principle of privacy by design. Privacy by design means that you want to minimize the processing of personal data. Providing somebody with bulk access to your database for potentially a couple of

criminal investigations that he or she is making, it just doesn't add up. So, yes, we are going to provide a kind of tiered access, but it's going to be on a case-by-case basis.

The other stuff of GDPR that has kept us busy is ... Well, as I explained, have a DPO or equivalent because it provides you with a single point of contact to deal with all your issues regarding data privacy. Privacy by design and by default is something you all need to reflect about. It does not need to be smeared out in long procedures. It's more a mindset. Everybody in your registry needs to be convinced that there is something to be considered as data privacy and it should be considered prior to start working on a project or something.

Also, everybody needs to focus on the bigger picture. If you have a view and an attitude to care about protecting personal data, it's much more important than really trying to fulfill 100% of this GDPR monster. Don't get into panic mode. Apply some logic.

Finally, that's my last slide, if I'm not mistaken. Very important. Check your status, whether you're a controller or a processor. If you have processors, if you have suppliers that do things for you and that process data in the same way, please keep in mind that you will need an agreement with them, a so-called processing agreement.

Have an emergency plan for your data breaches. It's something that's even outside the scope of GDPR, something that is a very smart idea.

Lastly, something that we're still struggling with is data retention and the timings that you can put on them. I'm not in favor of having an automated process that purges data from my database after a certain moment in time. I want to keep that data. I want to access ... I want to limit the access to that data so that the private individual is protected, but saying I'm just going to toss it away after, let's say, two years, I don't know. If I can avoid it, I will do, but it's not an easy thing under GDPR. So, that's it for me.

DEBBIE MONAHAN:

Thanks, Peter. Now, Stephen from [inaudible].

STEPHEN DEERHAKE:

With regards to GDPR and the domain registry, what is there to be worried about? Who we are briefly, we're a US territory, just like Puerto Rico. However, for purposes of US immigration, you're considered to have left the United States if you fly down there from Hawaii as they have their own passport control.

We are far, far away also from both the United States continent and Europe. As you can see, we're in the southern hemisphere,

just below the equator by about 15 degrees and we're way, way west and we're 16,000 KM from Paris.

So, from our position, we're far, far away from the EU and the GDPR the same way Australia and New Zealand are far, far away. We don't look like Europe, either. We don't have canals. We don't have cute buildings from the 16th Century. We have palm trees and sand and ancient volcanos.

So, this is where things get interesting. What is there for us to be worried about? If you look at this break down of registrants, as you can see, we have essentially no uptake in either American [inaudible] or the United States. Most of the registrations from the US are brands in America and some are local businesses for the most part.

Non-EU [inaudible] geographic locale, we have a little bit more. EU members, we have 21%, but if you add in EU members plus a couple of countries that are also in Europe, but not EU members, the percentage of registrations goes up rather significantly.

So, as a result, we actually do have a lot to be worried about, even though we're far, far away from the EU. We have always tried to respect what is required by the EU, and this is going on 20-plus years now, but this [inaudible] it up a bit.

With regards to privacy, we've always been pretty privacy conscious. Our WHOIS information, as you can see, is limited to domain status, the registrant name, the registrar, who it's registered through, the initial registration date, the EPP status of the registration. But, as you can see, since we do publish the registrant information, we do have a bit of a problem. And we only publish the name. We don't even publish postal address or phone numbers. But, even the name, as you saw from Peter's presentation, is problematic. I'm not an engineer.

So, what are we doing with regards to the GDPR? One thing we do, we keep all the registry data exclusively within the EU and we've done so for about five years now. We do have an exception to that because we have a legacy registrar system, which covers about 4,100 domains and some of those are also resident within EU and EU plus geographic locale. These are currently ... This information stored by the registrar is stored within the continental United States and I consider this to be a rather large problem for us.

We are taking steps to move the legacy registrar data to a data center within the EU, so it too is now outside of the United States. And that's part of that process we're migrating to, a new legacy registrar platform.

So, the question is, if we do all this, we get all the data out of the US, we're running our websites, both the EPP registry website and this registrar website in Europe, does it make us compliant? The answer is no, based on Peter's presentation. It does simplify things, however.

We don't have a clear solution. We are small. We are going to have to bring in an outside expert and get a data protection officer on board as to advise us how to proceed to ensure compliance. We have a lot of catch-up work to do with regards to documenting and publishing our privacy policy on the website, documenting all the processes that we use to crunch the data we get from our registrars and their customers, the registrants. So, we've got a ways to go and not much time left to do it in. Thank you.

DEBBIE MONAHAN: Short and sweet. Thanks, Stephen. Crystal from dot-CO.

CRYSTAL PETERSON: Hello, everyone. Just a little bit of background on dot-CO before going into some of the regulations and our thoughts on it. Dot-CO was launched globally in July of 2010. Since then, we've had about 2.2 million registrations. That includes both in country and our third-level domains, but also our global registrations

throughout the world. We are registered in over 200 countries and territories around the world and we were launched as a global domain and part of our concession contract with the ministry of Columbia was the fact that we would be a global resource.

One of the things that I wanted to share about before going into GDPR is a regulation that we have in Colombia and it is around privacy. There are requirements within the country of Colombia for sellers to gain consent of the use of private data at the point of sale. So, from a standpoint of where we are in Colombia we do need to gain active consent for the use of private data. However, from a WHOIS standpoint, there is no data removed from the registry and from our actual registry regulations. The domain may not be, is not active, but if the consent is not given, but the data is not removed.

Dot-CO is a registrar of our restricted domains, so as a registrar, we must comply with the Colombia privacy regulations, but this does not apply to the registry or outside of Colombia. So, as a registrar and all of our registrars, and in fact anyone that sells or receives privacy data in Colombia, this applies at the point of sale, but it does not apply to us as the registry.

In looking at GDPR and just what kind of base that we're looking at, we do recognize that 16% of our [domain center

management] did have registrants that were listed as from the EU and would be affected. So, this is something that we are very seriously looking into, and looking to ensure that we are looking to be in compliance.

As a global registry, we do look to comply with local law. For example, dot-co is also working in China for its [MIIT] license to be a ccTLD with an [MIAT] license, which would comply with local Chinese law for those registrations and registrants within the country of China. So, from that standpoint, then, we are also looking at the GDPR and how we as a global TLD can be compliant with that policy.

Through our parent company, Neustar, we are reviewing all of the data sets and the processes from the data that we gather from all of our registrars and we are working on building a compliant model at this time and we are expected to be ready by May 25th.

Also, during this time, too, we are reviewing internally our policies and practices within the registry that would be affected, namely certain WHOIS policies and other policies like that which would be affected and that we would need to potentially update. So, all of that is in process now, as is of course all of the discussions are going on.

Neustar itself, and also dot-CO, is in those discussions in order to make sure that we are doing something, implementing something, that is compliant and is as easy to implement as possible, even though it's not an easy implementation. That's it.

DEBBIE MONAHAN: Great. Thanks, Crystal, as well. Before we move on, could I get Stephen and Crystal to address the question that Liz actually asked about whether regardless of what [it's called], there's a sort of approach outlined in the GDPR, a positive enhancement if you like for registrants?

CRYSTAL PETERSON: So, from a dot-CO standpoint, there are a lot of privacy that we are looking to or that we do implement. So, ensuring that we are gaining consent within Colombia, looking to comply with GDPR. Is it a step in the right direction? As a registry, we want to ensure that our registrants are safe. So, as a regulation, I can't necessarily say if it's a step in the right direction or not. There is a lot of processes that are involved, but we do want to make sure our registrants are safe.

STEPHEN DEERHAKE: We have the same attitude that we've got to lock this stuff down and be in compliance and we have engaged a US-based firm to

basically act as our data protection officer and to provide us basically soup to nuts complete guidance on how we're going to tighten up, what do we have to do, and get all the written procedures in place, etc. So, we expect to have it all there put into place, but perhaps not all there and put into place by the effect date of 25 May.

DEBBIE MONAHAN:

I find it interesting that you've got dot-AU and dot-CO and they're both taking active steps to be prepared and ready, and I acknowledge that you've got European registrants and I acknowledge the reach of the GDPR. I suppose my question is what law do your agreements with your registrants and registrars refer to? And this is a question I'd like everybody out there to think of from other registries as well.

I don't believe that the Europeans should be able to set laws that I then have to run my ccTLD based on. It's a whole thing about having ccTLDs and being able to set your own policy. That's why we put what we did about New Zealand law in our agreements. So, what law do you bind your registrants and registrars to?

STEPHEN DEERHAKE: Ours are bound to US law. However, I agree with you that it's a little bit of an overreach. Personally, I think it's a bit of an overreach that the EU is coming across the Atlantic to chase us down, so to speak. But, this is something that [inaudible] put as globally on a slipper slope with their tax regulations that basically are precluding any possibility of an American citizen from actually doing banking outside of the United States. So, I don't see that we're going to get away from this over the ocean reach that governments are getting more and more interested in achieving for various reasons.

CRYSTAL PETERSON: Within our contracts, they are bound by Colombian law. However, as mentioned before, there are ... Because we knew that we were launching as a global resource, we do look to comply with local requirements where possible and where it does not clash with our own in-country laws.

In terms of [MIAT] in China, not to segue into that, but we have a solution that applies only to Chinese registrants. With GDPR, it is a little bit more encompassing. European citizen, but maybe in another country, but still being covered. So, the technical components of that become a little bit more tricky, and are we just dealing with, as the gentleman had mentioned before, if he's in EU when he registers versus out of EU, how do you know

that? All of those types of components make a GDPR implementation a little bit trickier versus just saying anything from a registrant over here is complaint and we're compliant.

So, yes, Colombian law, but the question becomes a lot broader and it's something that we are fully looking into.

DEBBIE MONAHAN:

So, I'm not a lawyer, but when I read that legislation, it isn't the most concise and prescriptive piece of legislation in the world. I can't help but wonder what the potential impact might be of case law that develops out of this. How long will it be before someone says you shouldn't be able to touch me or this goes too far, it overreaches, or whatever?

But, I'm also thinking, Peter, the impact of that, presumably when you're setting up for dot-BE and arranging your systems and your processes, you're interpreting the legislation and you're saying when it says I've got to explain my processes, you might say, well, I need to do that in such detail that it takes 20 pages, and somebody else might turn around and say I only need one.

I'm just wondering ... Because I'm also aware there's European registries in here as well. The different standards and what

potential fishhooks might you see coming from any potential litigation? I'm asking you to kind of foresee the future.

PETER VERGOTE:

I think you're touching a very important point. It's true that GDPR is not black and white. There is a lot of gray in between. I think you can be compliant in various ways. It will depend on case law and the positions of the local DPAs, the data protection authorities, in the European Union member states to provide clarity.

Also, the successor of the Article 29 Working Group will have to come up with a number of guidelines that could shed more clarity.

There is one thing I'm not too afraid of. Given that there is so much room for interpretation and there is so much gray and still unknown, if you are aware of the principles that are behind GDPR and data protection and you can demonstrate that you have been reflecting on it and that you actively have tried to integrate that in your processes and in your business activity, I would say that the chance that DPA calls at your doorstep with a warrant and now you're going to pay me a fine of 4% of your annual turnover is very close to zero. It's going to be a dialogue.

First of all, you will need some kind of a trigger, like a complaint by a very unhappy customer in order to get the DPA on track of your activity. Then, you will probably have an examination phase, and dependent of that examination phase, DPA could say, well, we know that you have been looking at it and you have chosen for that option, but we as a DPA consider it not to be compliant with GDPR, so we recommend you to revise your procedures and let's say within six months from now we are going to re-audit you and see where you are.

So, I think that pretty much is going to be the storyline, and what else is dependent from the organization, as you said. Some organizations might go in a very deep level of detail. Other ones may say, "I'm going to stick with the basics and we'll take it from there."

DEBBIE MONAHAN: Excellent. I was about to say, so now we've got around 15 minutes. Please make this as interactive as possible and put the three of them under as much pressure as possible.

PATRICIO POBLETE: Thanks. Patricio Poblete from NIC Chile. Stephen, [inaudible] some of your data in the EU and your point to have more or all of it there, is it really necessary? Does GDPR imply that you should

do that? As an American company, do you think that would go well with the America first policy?

STEPHEN DEERHAKE: We used to have a safe harbor agreement with the EU where you could move data back and forth and the EU thought that the US was treating it properly, so to speak, and that went away. Given the recent overreach of my government with regards to its global data collection practices and capabilities, I like it outside the United States, frankly. And no, having it all within the EU doesn't solve the GDPR problem, but it does improve the performance of the registry given that our customer base is in Europe by a little bit.

UNIDENTIFIED MALE: Debbie, your comment about one of the strengths of the CC community is the really nice diversity policies and standards to reflect communities. I think, in terms of GDPR, is no better exemplified by a country which Peter knows very well where the capital of the commission is [inaudible] two ccTLDs who have themselves different policies to bring into compliance with GDPR.

So, there is obviously a huge proliferation of different responses to GDPR, which all could be equally compliant. But, I'm

interested really around the range of tolerance. We talk about the whole ICANN debate about the gTLD responses. Is it really such a problem that we're going to have ... Obviously, within our community, we have got a massive range of fragmented and diverse policies and last time I checked, the CC is a vibrant community, not a haven of criminality. We have good relations with our law enforcements and governments and all that sort of stuff.

So, is this something that the G community does need to get probably exercised about the fact that there may be different gTLD compliant GDPR solutions in different parts of the world?

PETER VERGOTE:

Absolutely. I think you're spot on. What I find really disappointing currently and hold debate about the proposed interim model is that ICANN and ICANN leadership keep on focusing on the track there needs to be or there can be only one model, while I think that for gTLDs we might need a set – it could be a limited set, but at least we need a set of models because what's now being on the table is feeling all of us equally miserable. So, in that perspective, it might be a typical ICANN outcome where nobody is pleased, but everybody is supposed to live with it.

Quite frankly, I'm very worried. I still have to see how this thing evolves. But, currently, I have an impression that there is a lot of

smoke that is being blown. If you look at the ICANN model for gTLDs, the first impression you get is that this model wants to be the best pupil of the class because they're even going not to publish anymore data elements that are linked with legal entities and do not fall within the scope of GDPR.

But, then, as soon as you go behind the curtain, you see a kind of mechanism that would allow bulk access to whatever kind of data that are sitting in your Dbase. That really scares the hell out of me. Suppose that, for instance, legal enforcement from Thailand applies for accreditation, gets the accreditation, and they are giving full access to the Dbases of gTLDs. I mean, I'm running dot-brussels and dot-[inaudible] between 6,000 and 7,000 domain names in each TLD. Why are those registrations of relevance of an entire police department? This is so obvious that this is not in the spirit of GDPR.

So, I fear that if this model is not more fine-tuned and if it does not offer more flavors in future that, at a certain point, I might advise my registry to say go to hell with it. We are not going to implement it. Because, I would rather want to face a dispute with ICANN's GDD staff, because from a risk analysis perspective, I can put a figure on it, but I cannot put a figure if somebody says you're non-compliant with GDPR and I'm going to ask for punitive damages.

UNIDENTIFIED MALE: Thanks.

[NIGEL]: Thank you, Debbie. I want to pick up on something you said a minute ago, but something Peter said at the very end of what he just said is of use.

You were talking about from New Zealand what happens when, in the future, how is this going to be [inaudible] and interpreted and so on. What's interesting, what a lot of people in commonwealth countries don't quite get their head around is the style – I think it's the best way of putting it. The style of legislation of European law.

The best way to put it is they try to describe the purposes to be achieved without describing the mechanisms by which you get the spirit of the law, if you like. And European judges will turn around and say, "Well, it's obvious, and if this says this, then you've got to do that," or something.

The other thing is this business, on that same style, to talk about the rather interesting scenario we had from our Serbian friends. On the territory of the union I think is the expression or something very similar. It's very clear to me the purpose behind

that is to look at the likes of Facebook location tracking and things like that.

But, it is also very possible that somebody in the future might quite creatively say, “Well, I’m on the territory of the Union. GDPR applies to me when I register with a Thai domain name,” or something like that. I don’t know. It’s a bit of a stretch, but that’s what we need to consider. Thank you.

DEBBIE MONAHAN:

Nigel, don’t you think that one of the issues that ccTLDs face is that we have our governments sit on the GAC and other such things. They hear and watch what the Europeans are doing in GDPR and they look what ICANN’s doing to measure it, and then they come and they ask you questions. Well, how exactly do we [inaudible] in other such things?

So, I think part of this is an iterative thing of ... Though I sit there and I say in New Zealand we’ve got adequacy with the EU. Well, we do at the moment, but that doesn’t mean in the future that they don’t change it further or we don’t change ours.

Do you think that that’s another possible issue moving forward? Is the pressure put on, particularly probably the European ccTLDs, or maybe all of us? Does anybody else have that issue

where some governments look to others to actually help inform the questions that they then ask of you?

UNIDENTIFIED MALE: Well, I think the important thing is – and we saw this yesterday at the meeting with the GAC – is to have an iterative process with the GAC because the people who come to the GAC, some of them – most of them – have been coming to ICANN for a while. But, they change. There may be other departments and governments that have different views and maybe don't even talk to that particular part of their government. And those could be the guys with the machine guns or the big sticks in some countries. Iterative, keep going. That's why we keep coming.

UNIDENTIFIED FEMALE: Debbie, would you mind if I completely changed the questions? How do you pay for all this? I've been thinking about the operational impacts of what you've all described. You've got to change your processes, you've got to have a new data protection officer, you have to get external advice, you have to get your soups to nuts provider of services to help you comply. Peter is inherently miserable with everything. Well, it's true, I think, Peter. Do you perceive that this is going to have such an impact on your operations that you have to increase the prices of your wholesale domain names?

PETER VERGOTE: No. You're right. It comes at a cost, clearly, but the cost is manageable. It's not of that magnitude that it will have an impact on our business revenue forcing us to do anything about registration fees.

STEPHEN DEERHAKE: The answer for me is also no with regards to price change. My approach on this is to cap the expenditure at some level that is somewhat short of bankrupting the registry and calling it a day and exercising [inaudible] call GDPR compliance in spirit. We have given it an honest effort. This is along the lines of what Peter has described. If you can show you made the effort and you're pretty close and you are trying in good faith for complete compliance – because I don't think the issue of compliance with GDPR is a black and white, you completely covered everything. I don't think it's possible. I think that's one of the reasons the gTLD folks are not – even less happier than we are, shall we say. But, no, we're just going to give it an honest shot and not bankrupt ourselves and see what happens. It's a risk. I think it's a very low risk, though.

CRYSTAL PETERSON: From our standpoint, the answer is also no as well. We are not looking to increase our wholesale costs due to GDPR or any of the other regulations we've put in place, including the Colombian privacy regulations as well.

There are significant time and resource costs being that through dot-CO we're also working through Neustar. Some of those costs are absorbed across not specifically by our ccTLD registry budget itself. It's being absorbed through some of those layers. From a Neustar perspective, as a service provider, that is something that we are then taking on for many of the registries that we support, which includes dot-CO. It also includes dot-US to, from both ccTLD perspectives. But, we're not looking at that impacting our pricing, but there are a good amount of hours, resources, and time that are going into implementing this.

DEBBIE MONAHAN: Excellent, thank you. I think in the absence of any other questions, it's probably a good place to end, which is about the money. It comes back to the money.

I'd like to thank the three of you, the three presenters, for a very interesting thing. I think what's clear is that some registries are well-advanced in their plans and have already identified the changes they need to make. Others are still working through what changes they actually need to make and others have

identified the changes or in the process of implementing it. And I think that range of positioning probably reflects the range of probably everybody in this room.

So, Peter had a nice to-do list and it's obviously based on what they're going through in dot-BE. I'd just like to thank you all very much for your contributions.

KATRINA SATAKI:

Thank you very much. On this very exciting note, I would like to thank you all for your active participation in the ccNSO Members Meeting Days. Please do not forget to fill in the survey. It really means a lot for us to know what you want to discuss, what you want to hear, what you liked, what you probably did not like.

I'd like to thank also the secretariat who did a lot to make sure that this all happens. Thanks a lot to all presenters, all those who asked questions, volunteers. Thanks to Giovanni for providing us this chocolate. They're there. You did not know? Giovanni, he went for more chocolate.

So, thank you very much. In 15 minutes, we're going to have ccNSO Council meeting. It's an open session. Anyone can participate. I see that Stephen still wants to say something about GDPR. Something you forgot?

STEPHEN DEERHAKE: No, I just want to propose that we give the secretariat a round of applause for all their work this week.

KATRINA SATAKI: So, thank you very much. See you all in Panama and have a safe trip back home.

[END OF TRANSCRIPTION]