KOBE – GAC: Inter-Constituency Engagement (2 of 3) Wednesday, March 13, 2019 – 08:30 to 10:15 JST ICANN64 | Kobe, Japan

MANAL ISMAIL, GAC CHAIR: Thank you everyone for making it at this early hour and although we don't have a full room, with respect to those who make it on time, I think we'll be starting. Please take your seats.

> So this is the first session today on the GAC inter-constituency engagement and the 45 minutes we will have several reports from our nominees and points of contact for other parts of the community. But let me just get the slide where we have the order of speech. So if we can go to the next slide, please. So we were supposed to hear GNSO update from Iran but afraid he's not in the room. So Pär, if you are ready, maybe we can start with the ccNSO, if you don't mind.

PÄR BRUMARK: I don't mind.

MANAL ISMAIL, GAC CHAIR: Thank you.

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.

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PÄR BRUMARK: For those who don't know me, I'm Pär Brumark, representing the government of [indiscernible] and also a contact person with the ccNSO. For those that doesn't know what the ccNSO is, it is the ICANN constituency country code managers meaning that GAC and ccNSO have a lot of mutual interests so we have a good relationship. The work as contact person is not very burdening, we keep in touch, if there's topic of mutual interest, we speak about it, if there is anyone in the GAC that wants to address the ccNSO with some issue, they can go through me and I will -- we can speak about it, and that's about what I do with the ccNSO thank you.

MANAL ISMAIL, GAC CHAIR: Thank you, Par. And thank you for volunteering to be our point of contact with the ccNSO. I know you've been working on today's agenda also with the ccNSO.

PÄR BRUMARK: Yes, in a couple of hours we will have a meeting with the ccNSO, they're coming here for a presentation. We're not 100 percent ready yet so I'm not going to say everything about it.

MANAL ISMAIL, GAC CHAIR: So thank you, and now moving on to our next speaker, I have Charlotte from Portugal, so Portugal is our point of contact with



ALAC. And Charlotte is very helpfully presenting today on because of Ana who couldn't make it to this meeting so many thanks.

CHARLOTTE SIMOES: Thank you Manal, it's a pleasure to be here and join for you this session. So I will try to report what has been the work of the GAC liaison to ALAC, which represents the end user interest. The liaison started its role after Panama meeting last year in June, not a long time ago, so the liaison has short experience to share but it's still a valuable experience to share with you.

> First of all, GAC and ALAC joint meetings have been thought to maintain a channel of communication, to share information on the activities of both committees, and this has been relevant space to bring up discussions on common issues where GAC could better understand the end users' interests. The starting point of the liaison work was to look at past experience as a reference to find ways to explore cooperation. So in previous meetings we have seen some exchange of views on common issues such capacity building in underserved regions, policy development for future gTLDs, geographic names, community application, diversity issues, consumer protection to name a few and this has been essentially short discussions on common issues with little time to dive deeper and have concrete conclusions. And there



was a feeling that the GAC was not taking advantage of this convergence of interests. This nevertheless, we saw emerging some concrete input with the adoption of joint statement on inclusive informed and meaningful participation in ICANN.

Then the liaison intention was and still to understand what kind of cooperation GAC and ALAC want. In this context the efforts of the liaison work were direct today understand ALAC priorities by following discussions on ALAC mailing lists and identifying together with ALAC liaison common grouped and topic of mutual interest where both committees could find added value. So important to note this was with the support of the GAC secretariat and the GAC chair.

During Barcelona meeting, the first meeting as liaison, efforts were directed to have substantive discussion on a set of questions on new gTLDs but this did not work as expected in terms of involvement in the debate of the members and output. So now the liaison is still figuring out if there's a space to deepen cooperation during ICANN64's meeting and inter-sessionally through small like-minded groups that could work in between meetings and prepare the plenary meetings and to have also concrete output as the statement on inclusive participation in ICANN and proposal for a joint EPDP statement on the agenda today on the joint session. So this is why in our next joint meeting we look forward to seeking valuable input and opinions from you



to identify common interest issues, cooperate deep cooperation between GAC and ALAC. Thank you.

MANAL ISMAIL, GAC CHAIR: Thank you very much, Charlotte, and special thanks to you and Ana, I know you have been working so hard inter-sessionally to prepare for the agenda of today's meeting with ALAC and thank you very much and I stress the importance of the inter-sessional work that you have done and also our relationship with other SO/AC and other parts of the community and that's why we decided to try to have focal point of contact with other constituencies and advisory committees so that we can maintain the channels open and try to coordinate and align work as possible. So next I have Feng.

GUO FENG: Thank you, Madame Chair, and good morning to everybody in this room. And thanks for this opportunity to talk about some of the interesting points, interesting developments of the SSAC. At the beginning I would briefly introduce to you the role of SSAC. As you may know, SSAC standards for the security and stability advisory committee. The ICANN community as vies the ICANN community and board manners relating to the security and [indiscernible] addressing [indiscernible] systems, operational matters, administrative matters and registration matters. SSAC



engages in ongoing risk assessment and naming and addressing allocation services to assess where are the principal threats to security and stability lie and also advises the ICANN community accordingly.

The SSAC produces reports, advisories and [indiscernible] on a range of topics. The SSAC considers matters pertaining to correct and reliable operation of the root name system to address allocation and Internet number assignment and registry and registry and registrar services such as WHOIS. The SSAC also tracks and assesses risks and threats [indiscernible] allocation services.

If you happen to log on to the SSAC web page, you will find SSAC activity update slide for each ICANN public meeting that those slides, I find them very interesting. From the latest SSAC update slide, that was for last ICANN meeting, Barcelona, you may want to know the following points: First, the personnel changed. The [indiscernible] completed his services as liaison to the ICANN board from 2008-2018, and [indiscernible] starts a three-year term representing the SSAC as liaison to the ICANN board. And currently [indiscernible] the chair of the stability and security advisory committee. There are approximately 37 members in the committee.



And second, there are six current work within SSAC are in progress. The first is the name [indiscernible] analyzes project, the second is SSAC organizational review. The third one is Internet of things. The fourth is emerging security topics. And the five, the SSAC workshops. In general they hold SSAC workshops at every ICANN public meeting during every ICANN public meeting and number 6, membership committee. If you want to know some of the details about those things, you can -- I recommend you to download those slides to give a further look.

And third, you can find that the latest SSAC document which is SSAC 104 which is released on the 21st December, 2018, and it is a comment about the SSAC comment on initial report of the temporary specification for gTLD registration data [indiscernible] policy development processes. They are common on the EPDP.

In addition, if you look at the current front page of ICANN, you can find a link to a YouTube video clip, an interview with the current SSAC chair, Rob Rasmussen, and in the video, he describes the use of homographic attacks. Because of the full schedule of GAC and my personal schedule, I didn't have a chance attend the SSAC meeting, but I have been able to touch base with SSAC council some I got use useful information that SSAC is going to hold a SSAC public meeting. The time is today, this afternoon 3:45-4:45. So in this session, the session is public presentation of the work of the SSAC so if you want to know more about SSAC, the recent



development, I recommend you to go to that session to listen and to hear. I will stop here. Thank you very much.

MANAL ISMAIL, GAC CHAIR: Thank you very much, Feng, and I have to admit it was your idea that we have a point of contact to the SSAC, and thank you for bringing this to our attention and for volunteering and thank you for the excellent and exhaustive report. And although it's been awhile since we last met SSAC, but as you all know, they work on issues that has to do with the security and stability of the Internet which is of interest to the GAC of course. So thank you very much again, Feng for bringing us up to date on what is going on at the SSAC.

> So we have next Liu. I hope I'm pronouncing your name okay and apologies if not. Our nominee to the third accountability and transparency review team. So over to you. Thank you.

LIU YUE: That your, chair, Madame, and Liu Yue from China, and Guo Feng is my colleague in [indiscernible] and I thank you for the GAC leadership and GAC members for the nomination, so I can join the ATRT3 team and I was very happy to introduce some work of ATRT3's team: So I have my slide? Okay. So can you start the slides. So while waiting -- we have slides, and I prepared for this



introduction slides so ATRT1, and you will know ATRT is [indiscernible] the transparency team, and third one, ATRT3 in 2010 -- 1 in 2010 and ATRT3 in 2018, and [indiscernible] between ICANN and the US government and after the IANA transition, revised bylaws, ICANN, -- next please. No. Sorry. Up. Sorry. Up page.

So ICANN bylaws section e, they have a specific review, [indiscernible] and you know the ccrt vice president for consumer choice and computation and WHOIS, and SSR 2 review and those are also the ATRT3 and because of the shortage of [indiscernible] ICANN, ATRT3 delayed at least one year so last December ICANN announced the ATRT3 member and now in this team we have 18 members from the SO/AC, and I was the only one representative from the GAC and also we have other from the SO/AC one and [indiscernible] and GNSO, the largest group, -- and also we have liaison from the ICANN board, it's Martin. And now in ICANN -according to the resolution of the ICANN board we will start the formal work on no later than 120 days after the ICANN board resolution. So now we only have the informal discussion and so we have four plenary [indiscernible] we have two ALAC co-chairs, Cheryl Langdon-Orr from ALAC and Patrick Kane from GNSO and we have [indiscernible] in January and February. And also, we have informal meeting on Monday to discuss what are the next



best steps for ATRT3, but unfortunate ICANN doesn't provide remote access, so some members cannot join the discussion.

And in the plenary call we discuss about what plan and mechanism and scope of review and decided the first face-to-face meeting on April 3-5th in the ICANN office -- some members suggested we can have formal meeting in this ICANN 64 in Kobe but the support team said it's better for the ATRT3 to have a face-to-face meeting at ICANN headquarters and then that will be the formal start point of the ATRT3. Then we will finish working in one year so we will have a final report next April.

And you can have more information from such links and we have mailing lists being published and also, we have a document on the activities on the web page and also for the last four plenary calls we will have an audio recording and the transcript in the wiki page. So if you have any question you can ask me, send email to me or send email to ICANN support team. So we will have next plenary call on the next week so I'm very happy to introduce the progress of the programs of the ATRT3 in the mailing list, by mail or in the next ICANN meeting. So thank you very much.

MANAL ISMAIL, GAC CHAIR: Thank you very much, Liu Yue, and for assuming this responsibility on behalf of the GAC and thank you again for keeping us updated on the important work of the accountability and transparency



review team. So thank you and we look forward to the progress of the review team in coming years. Thanks.

Next, we have Nigel from the Caribbean Telecommunications Union, as you all know, and our nominee to the customer standing committee and he not only volunteered to represent the GAC on the customer standing committee but also reporting to us from remote. So thank you very much, Nigel. And I'm sure there is also the challenge of time difference. So do we have Nigel?

NIGEL CASSMIRE: Yes, I'm here. Can you hear me.

MANAL ISMAIL, GAC CHAIR: Thank you, Nigel, good to have you and thank you for bearing any challenges with the time difference or any technical difficulties, and over to you, Nigel. We have your slides on the screen.

NIGEL CASSMIRE: Okay. Thank you very much. Good day to everyone there. It's good evening good morning for you there. This is Nigel Cassmire from the Caribbean Telecommunications Union, and I'm seeing you from port [indiscernible] in Trinidad and I will give you an update on the customer standing committee. I have been the liaison since October the 1st, 2018 so this would be my first



update to the six months so far that I've been the liaison. So I decided I would probably give a little more comprehensive update than monthly. So there are slides here taken from a more comprehensive update from the board technical committee, and I will try to go through as quickly as possible.

This customer standing committee basically has been established to undertake the oversight function of the PTI [indiscernible] and IANA function, established in the IANA transition process to replace the US department of commerce NTIA and began October of 2016 and for the first two years the GAC representative was [indiscernible] from Norway and I took over in October last year. The customers of the IANA [indiscernible] basically the registries and the root server operators as well and basically what the customer standing committee does is it reviews -- by looking at the monthly reports of the PTI as it's called, that runs that IANA meeting function.

This is the membership of the customer standing committee. There are two members from the gTLD committee appointed by the registry subscriber group, the rysg, two ccTLD community April appointed by the ccNSO, and those are the prime members of this customer standing committee, those are the full four members and provision from a fifth member from a registry not affiliated with the ccTLD on or -- but a difficult task to find such a registry who might be willing, to date none has been appointed.



So four main numbers and six liaisons from the communities and you can see my name represented there for the GAC.

Very important as well, one of the liaisons is from the PTI, Naela, quite instrumental in advancing the work of the customer standing committee.

So its core responsibility of course is monitoring the performance the PTI in terms of the IANA function and the PTI has a correct with ICANN to perform this function, it's called the naming function agreement and there are certain level agreement metrics contained in that naming function agreement. In fact, what attracts as many as 62 individual metrics every month and they are grouped into different types of metrics, some are technical, some [indiscernible] time related to creating new TLDs and so on, but 62 is a big number and those metrics were developed by one of the design teams in the IANA transition process and they were developed using a sample of results from -- I think it was like four or five months' worth of results and the sla's were not in the IANA naming function contract at the time not the most efficient thing because if [indiscernible] were necessary, one has to amend some of those sla's and there's a need for a contract amendment, a cumbersome process.

Let's go to the next slide and we will discuss that point a little bit more. To give you a sense of how the function has been going



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over the time from October 2016 when the PTI was established, this table summarizes it, the green just shows the months for which I was the liaison, and you will see that in many months the performance has 100 percent, the percentages represent what percentage of the SLA metrics met for that month. So 100 percent means perfect performance. There is no month where it went below 95 percent, suggests no month which no more than 2 of the 62 metrics not met. The question is does it represent an operational problem as far as PTI is considered. The short answer is no, many metric misses resulted from SLA metrics in the process of being amended because the doesn't report a level at which it is become [indiscernible].

And this is an sample of one of the reports, a page from one of the reports, like a 43 page report every month with the metrics and analyses and this was one page from November 2018 when there was one metric that was not met and that metric highlighted in kind of an orange color in the green column and the metric is technical check supplemental, the standard was one minute and the actual performance was 1.29 minutes. So this is typical of the type of [indiscernible] metric that my might occur from month to month, marginal failures and failures that do not affect the customer. And proposed to be amended based on now the more than two years' worth of experience with operations and the level at which it is going to be set is as many as ten minutes so the fact



that some of these metrics are not being met at present is really, really not indicative of any sort of operational issue.

I will use the slide to say that when the customer standing committee is reporting on the performance of PTI on a monthly basis, there are three categories of rating, one is excellent, used when 100 mark is achieved. Satisfactory is where the performance is less than 100 percent but if it does not indicate any particular service problem and these improvements -- SLA problem and this improvement used when there was a problem that required improvement. So as mentioned, never been a case where it has been less than satisfactory, and in many months in fact it has been excellent. February of 2019, in fact was 100 percent as well.

Next slide. So I mentioned this earlier that we are in the process now of amending some of the sla's based on the more substantial operational experience of PTI ask discussions between PTI and ICANN in terms of what might be more appropriate levels to which those metrics were set. It's a cumbersome process to have the metrics as part of the contract and in changing metrics what is also is a contract amendment to basically taking the metrics out of the contract such that the process amendment in future could be more operational efficient.



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Next slide, please. An important thing to note as well is that since this PTI is so young an organization and this whole customer standing committee process is also young that to do some of these things there weren't really procedures in place in order to make these changes. So part of making the changes is putting procedures, appropriate procedures in place to effect those changes. So this csc and PTI had to develop a process for amending the service agreements and apart from the process they had to establish a procedure for modifying SLA and these procedures are pretty well advanced and in some case have had to go for public comment for draft changes to the comment in February of 2018, no objections, in fact there was one supportive comment and it's going through now the board approval processes and it is expected that everything would be fully approved over the next couple of months, probably like April or May of this year.

Next slide, please. Apart from the monthly monitoring, the csc might also get complaints of customers from the PTI or who experience PTI services, not ready to act on individual complaints but if it's found that some complaints represent a systemic issue, can initiate remedial action procedures.

Under remedial action procedures the PTI can follow an action plan to correct whatever systemic problem and there is an escalation process in case there's an issue with the PTI acting on



and following through, PTI board, ICANN CEO, and then ICANN board, these were initially approved in March last year with small changes in January this year but not really an opportunity to invoke those because the performance has been very good.

The csc also informs the community about PTI's performance. Produces monthly reports which are published, make presentations to the ICANN community like I am making an update now to my own GAC community, monthly meetings of the customer standing committee, usually on or about the 15th of each month. There are public meetings, information Monday morning there was a public meeting and this afternoon a meeting at the csc at 3:00 with the ICANN board technical committee and I think a lot of this updated information would be given to the board as well.

All the information, reports, and current -- available on the csc website, the link is given there. Next slide, please. The performance of the csc is also subject to review. There was a charter review that was done between October 2017 and June 2018 and that charter review in fact recommended some small changes to the remedial action procedures and also made some recommendations relate to travel funding for csc members. Apart from the charter review there was a requirement for csc [indiscernible] review initiated in October of 2018 and report produced with public comments which increased in February of



2019, again with no adverse comments received, in addition to which there's periodic IANA function review and in October of 2018, the status of that still pending and there are customer surveys done by the PTI customers and really no significant problems. Next slide, please.

So are there any challenges? Sometimes if there are changes to the membership of csc -- most of the meetings of the csc are on the phone. Csc does not currently get travel funds and it is felt that maybe some travel funding would enhance the work of the csc, if irregularity of the meeting attendance, mostly with liaison with changes of the liaison. The charter review also recommends that that the csc continue to meet, the ccNSO and the rysg at least twice annually, often taking place at ICANN meeting and -- travel funding, two ICANN meetings per year.

Next slide. So in summary, the PTI performance is extremely good. Some minor metrics were missed or should I say some minor misses, rather than minor metrics, there has been no criticism or operational problems. The csc has come together as a committee and functioning quite well, establishing procedures to do certain things, the process working very well. The only major challenge is considered to be absence of travel funding which is felt would help improve its mission. I think that's it. Thank you very much.



MANAL ISMAIL, GAC CHAIR: Thank you very much, Nigel, for this exhaustive and complete report and thank you for the summary at the end of the key takeaways, and thank you for participating remotely. I truly appreciate your dedication and your help and bringing the GAC up to speed on the customer standing committee which is a very important committee as well. Yes, thank you very much, Nigel. Any final words from you?

NIGEL CASSMIRE: I think I will continue to listen to the rest of the session and then maybe go to sleep [laughing]

MANAL ISMAIL, GAC CHAIR: Thank you, thanks Nigel, and we missed you at this meeting but thank you for participating remotely. So I think we have no more reports, so this brings our reporting from the liaisons to conclusion. If you will just allow us maybe until 9:30 we can have a short break until we bring the communique on the screen, we can use the next 45 minutes in checking where we stand with the communique. We were missing some text yesterday so maybe we can see the new text that we haven't gone through yesterday and also see the text that we parked for further discussions among GAC colleagues where we stand just to facilitate our discussions



again this afternoon to finalize the communique. So we will stop here and please make sure to be back in the room at 9:30. Thank you.

PLEASE STAND BY ...

MANAL ISMAIL, GAC CHAIR: Thank you for your patience. As we agreed, we will have a quick check on the communique on any new text that we have received or any new text that has changed from yesterday. So the first new part is our meeting with the ICANN board. This was not available yesterday and it reads: The GAC met with the ICANN board and discussed -- and again, this is the list of topics we discussed with the board -- the applications for dot Amazon, two character and country code at the second level, the GNSO PDP, and IGO INGO access [reading] potential new gTLD rounds and the board GAC interaction group meeting at ICANN 64, preparations for successful implementation of ICANN strategic plans through fiscal year 2015. I think maybe we should delete the [indiscernible] any comments? Okay. Thank you. Then so again, this is a placeholder for the meeting that we will be having with the ccNSO immediately after the coffee break so it reads. The GAC met with members of the ccNSO and discussed status report, ccNSO retirement policy development process working group -yeah, I think status report of the ccNSO retirement policy



development process, PDP working group, presentation of DNS over https and discussion on the future scheduling of the joint meetings between the ccNSO and the GAC.

Again, this is the agenda of our meeting today. We will keep it as such until we have the meeting and it becomes factual. Same thing for the meeting with the ALAC. Again, immediately after the ccNSO and before lunch, and it reads: The GAC met with members of the ALAC and discussed joint GAC ALAC statement on EPDP, alignment of new gTLD subsequent procedures with the CCT review recommendations, cooperation in capacity building, reactions to President Macron's IGF speech, follow up to ALAC statement on participation in ICANN. So this is the agenda we should be discussing during the meeting before lunch and again, we will keep it marked yellow until it becomes factual.

So we are moving on, liaison report, received reports, initiatives including ALAC ccNSO, GNSO -- Rob is reminding me this should be reporting throughout the week and not only this morning so the GNSO could also be safely included. So again, the GAC received reports on the efforts of its points of contact and liaisons to a number of other groups and initiative, including, ALAC, ccNSO, GNSO, SSAC the third accountable and -- the registry directory service, ATRT3 team and the customer standing committee.



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So just to those move just walked in, we decided to [indiscernible] this slot on the agenda to quickly review any new texts that we have received. I do apologize, it was not marked as such on the schedule but again, it's a quick review and it's all on the factual parts of our meetings this morning. So moving onto the cross-community engagement group on Internet governance. And yeah, I think it's good to spell it out because it's not indicative. So it's cross community engagement group on Internet governance. And in the title, we need to delete working So just for GAC colleagues, the cross-community group. engagement group on Internet governance will be coming to the GAC on Thursday morning during our operational matter's session. They are briefing the GAC on the recent updates and the change from a cross community working group to a cross community engagement group and reaching out to the GAC seeking their support and whether the GAC would like to be a chartering organization of this cross-community engagement group.

So between, the placeholder here says members of the crosscommunity engagement group on Internet governance briefed the GAC on developments regarding this initiative and encouraged GAC involvement in the effort. Again, we don't know how the meeting will be concluded or what will the result be so we will leave it at this for now.



On-- yeah, the cross community working group accountability work stream 2. So we have received this text from Russia on the jurisdiction so the text reads, the Russian federation raised an issue on possible future steps that need to be taken in order to address the concerns regarding ICANN jurisdiction stated by some stakeholders in the jurisdictions --

[technical issue...please stand by]

MANAL ISMAIL, GAC CHAIR: Yes, Russia, I think all of us need more time to consider this text. If it said the Russian Federation expressed, that would be clearer and we would make that suggestion but I think we need more time to consider it. Maybe we can have the text between square brackets and I encourage you, those who expressed views on this text, that maybe you get together and --

> We had a discussion on the last sentence of this paragraph. So my understanding is that there was an agreement on deleting the last sentence.

> The deletion of the last sentence was a compromise reached between Brazil and the US. I don't know if there is agreement amongst the rest of the room and other Amazon countries but this was a result of our conversation to address both of our concerns and happy to reiterate those concerns but for the record this was



the agreement that we reached last night. I believe we will be getting again to this when we also have everyone in the room during this afternoon, but this is where we stand now here. And moving on, [reading]

SPAIN: I concur completely that the proxy privacy [indiscernible] is not a new policy, in the final report is from 2015 which is actually not new. So it is an [indiscernible] policy and I am totally convinced, and Spain's position is it should be implemented, it's high time. For data protection authority can be against the implementation of this policy and that law enforcement in every country will concur that all these efforts to provide access to redacted data for law enforcement purposes for law enforcement could come to naught if this is not implemented. Therefore I insist that it please be added. As I mentioned as an example of [indiscernible] existing policies and if there's a reason not to include this example that it be said. Thank you.

MANAL ISMAIL, GAC CHAIR: Thank you, Spain. Any reaction to this text now or you want some time? Okay. Then we will leave it at this now and come back to it this evening. I can see also some changes in the rationale. So maybe I can read the whole [reading] the GAC has previously noted that such legitimate purposes include civil and criminal law



enforcement, cyber security, consumer protection and IP rights protection. The GAC also notes that the Europe data protection board in its guidance has expressly encouraged ICANN and the community to develop a comprehensive model covering the entirety of the data processing cycle from collection to access. As highlighted in the GAC Puerto Rico [reading] bylaws consistent with the [indiscernible] to the GDPR which provide examples such as preventing fraud, ensuring network and information security including the ability to resist unlawful or malicious actions and reporting possible criminal acts or threats to public security to authorities and there is a reference to GDPR [indiscernible] so any so we will be receiving this soon. Okay.

So maybe -- I'll stop here and maybe allow colleagues who have comments on certain parts of the text that they can utilize this time to discuss and come to agreement so that maybe when we come back for communique we can have some agreed text. Just checking the schedule. So our meeting with the ccNSO starts at 10:30, so we will pause now, and we will reconvene here for the ccNSO meeting at 10:30. And again, please try to also discuss any comments you have on text.

[END OF TRANSCRIPTION]

