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**ICANN Transcription**

**Thursday, 20 February 2020 at 14:00 UTC**

**GNSO Temp Spec gTLD RD EPDP – Phase 2**

Note: Although the transcription is largely accurate, in some cases it is incomplete or inaccurate due to inaudible passages or transcription errors. It is posted as an aid to understanding the proceedings at the meeting, but should not be treated as an authoritative record. Attendance and recordings of the call is posted on agenda wiki page: [https://community.icann.org/x/OQ\\_JBw](https://community.icann.org/x/OQ_JBw)

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**JULIE BISLAND:** Good morning, good afternoon, and good evening and welcome to the GNSO EPDP Phase 2 Team Call taking place on the 20<sup>th</sup> of February 2020 at 14:00 UTC.

In the interest of time, there will be no roll call. Attendance will be taken by the Zoom room. If you're only on the telephone, could you please identify yourselves now?

Hearing no one, we have listed apologies from Janis Karklins, Eleeza Agopian from ICANN Org, and Matt Serlin from RrSG. RrSG has formally assigned Sarah Wyld as their alternate for today's session.

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*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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Alternates not replacing members are required to rename their line by adding three Z's to the beginning of their name, and at the end in parenthesis, your affiliation—alternate, which means you are automatically pushed to the end of the queue. To rename in Zoom, hover over your name and click “rename”. Alternates are not allowed to engage in chat apart from private chat or use any other Zoom room functionalities, such as raising hands, agreeing, or disagreeing.

As a reminder, the alternate assignment form must be formalized by way of the Google link. The link is available in all meeting invites towards the bottom.

Statements of interest must be kept up to date. If anyone has any updates to share, please raise your hand or speak up now.

Seeing or hearing no one, if you do need assistance, please email the GNSO secretariat. All documentation and information can be found on the EPDP Wiki space.

Please remember to state your name before speaking. Recordings will be posted on the public Wiki space shortly after the end of the call. Thank you, and with this, I'll turn it over to our EPDP Phase 2 co-chair, Rafik Dammak.

RAFIK DAMMAK:

Thanks, Julie, and thanks to all for joining today's call for the EPDP. As you can see on the agenda, we made small changes to take into account what happened lately and to have a short time to discuss about that. But we will try to focus on our main items for today, in a way to make progress for the coming weeks.

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So, there is no objection, I guess we can move to the next item, but I see Alan is in the queue. Yes, Alan?

ALAN GREENBERG: Thank you. The agenda only has a little over an hour's worth of time schedule. Does that mean that there is an intent to try to keep this meeting short or is there some expectation that these are going to grow anyway? Just for the record, there's a subsequent procedures meeting that was scheduled overlapping with the last hour, so I wouldn't be unhappy if we ended early, but I'd like to know what the intent is.

RAFIK DAMMAK: It was not intended to end early, but at the end, it depends about our progress and how much time we will allocate for those agenda items.

ALAN GREENBERG: [inaudible].

RAFIK DAMMAK: Okay. Thanks, Alan. Okay. So, let's move to the next agenda item. I think, as you are all aware about the announcement that was made today by Board and ICANN Org regarding Cancun meeting. At this stage, it's unknown on how this virtual meeting will work in terms of schedules, session, and so on.

On our side, we are taking that into account and we are trying to get as much information as possible, and I think there is a call with

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the community leaders this Friday to discuss some of those questions. But we'll take the opportunity for today to take some input or suggestions from [inaudible] how we can cope or handle this and if you have any idea how we can organize ourselves or if there is any alternative. So, we welcome any input or suggestion.

Yes, Marc. Please, go ahead.

MARC ANDERSON:

Thanks, Rafik. I saw Janis's email where he laid out a couple of options and those options seem like a good starting point for discussion. I think this is all very new and all of us are still digesting it. But obviously losing this face-to-face time at ICANN 67 is going to be impactful and we have to figure out how to how to make that up.

I think it might be ... I haven't had a chance to talk with my registry colleagues. I haven't had chance for us to discuss it, so it might be a little premature to have an in-depth conversation on this now, but I think it might be a good idea to ask groups to weigh in on what their thoughts and suggestions are.

I was very intrigued by the last option, scheduling another face-to-face meeting. That may be something that we could benefit from, regardless. So, it might be worth at least inquiring as to that possibility now. But, again, I have to reiterate that I'm just speaking off the cuff here and haven't had a chance to talk with any of my colleagues and get their thoughts on that.

I'll throw one more thing out there. I don't think it's realistic for us to have a 10-hour call on a Saturday. That's an unfortunate time

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slot for us. And if people are not locked away at a conference center, I don't think it's realistic to expect people from home or from their home offices to be to be able to dedicate 10 hours on a Saturday to a productive call. So, I'm not sure that's a great use of our time or realistic to think that that'll be productive for us, at least not for a full 10 hours.

But I think this is all very new, and we need to give groups a chance to caucus and maybe provide input to the list.

RAFIK DAMMAK:

Okay. Thanks, Marc. So, the intent of having this is really to, as I tried to explain in the beginning, is to get input, comments [inaudible] proposal because we all I think are digesting and trying to get as much information as we can. So, I don't think we are intending to spend a long time on this, but it's opportunity to get any proposal. And Janis made some already.

But, yeah, we will have I think, anyway, will follow up after this and if all groups can make proposal that will be helpful. But let's take opportunity to hear for some initial proposals or ideas. Laureen, please go ahead.

LAUREEN KAPIN:

Quickly. I agree with marks observations and I would emphasize that there is a special value to the face-to-face interactions. We tend to reach compromises and get more done more quickly. So, I would press for that option. I think location could be subject to discussion. I know there are a number of people on the east coast in the DC area as an option. I, too, would be against having some

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sort of marathon 10-hour session over the phone, which I think people would begin to glaze over for.

And I also would weigh in against stacking up numerous meetings each week to catch up, because I think we all are a bit inundated with not only the work of this particular EPDP meeting group, but the IRT and [RDAP] related to small group meetings that has to deal with this. So, to stack up on top of that, I think would have a lot of diminishing gains. So, my proposal is to come up with some alternative face to face in a location that folks are comfortable with.

RAFIK DAMMAK:

Okay. Thanks, Laureen. Volker?

Volker, if you are speaking, we are not hearing you.

VOLKER GREIMANN:

Sorry. Looking at what we're trying to achieve during the meetings in Cancun and our work schedule, I think the option that makes most sense here is to have possibly two normal sized meetings during the time that we would have otherwise spent in Cancun. Maybe another meeting in May, seeing that we have a tight deadline to finish our work. Having some form of crunch time right at the end to allow us to finish some open questions to improve the quality of our report seems to me like the better option. Even if we had the opportunity in Cancun, it might still have made sense to have that meeting right there at the end. So, I'm not opposed to the suggestion that Janis made, if we need that time, provided that we need that time.

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I'm also not in the camp of people that will be able to stay awake during a ten-hour call on a Saturday or any other day in the week because that's just a mind killer.

RAFIK DAMMAK: Okay. Thanks, Volker. So, we have Alan and then James. Alan, please go ahead.

ALAN GREENBERG: Thank you very much. I basically agree with what Volker said. I think we should try to accomplish some work during the Cancun timeframe but there's no way that we're going to get the kind of attendance or focus that we would have. And even if we did, I don't think we would achieve very much in it. We'd get a lot of talking. The long hours and the time zones for some people will make it just ridiculous. And having people allocate the time when they're physically still in their city with their families and their work is going to be more difficult than I think people—certainly the people organizing this—can do.

I also agree with Volker that I think a face-to-face at the end of the crunch was probably always something we should have planned. And certainly given that we're not having the face-to-face in Cancun, I think that's mandatory.

So, I think we need to try to accomplish some things. I don't have a clue how we're going to come to closure without the actual face-to-face time in the near term, but I think those are our only options.

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Janis also later on said maybe we should continue to plan to meet in Cancun. I don't think that's viable. I'm not sure ICANN could handle that without any ICANN staff there. I suspect they are giving up all of the meeting space and probably already cancelling reservations for those who are funded by ICANN. So, I don't think that's a viable one at all. Thank you.

RAFIK DAMMAK: Thanks, Alan. James?

JAMES BLADEL: Just agreeing with the previous speakers. Definitely not on board with the idea of a ten-hour meeting on a Saturday. I won't attend. That's ridiculous. So, I think this is just part of the consequences of this decision and the impact to our calendar and part of the broader economic impact on this particular outbreak. I think there were a couple of folks who were suggesting different locations and I just want to point out it wasn't Mexico or Cancun that was the problem. It was the gathering of folks from all around the world into one room that was the problem. And I think that is inherent in wherever we choose. So, if we were to do this in DC or LA or whatever, we'd still have the same issues Thanks.

RAFIK DAMMAK: Thanks, James. Thanks, everyone, for all the comments, and also for those in the Zoom chat. I'm not going to make any decision today. I think there is still some information we have to get and see how this virtual meeting itself will be organized or if there will be a change in the schedule and how it will impact us because we



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cannot just talk about the EPDP without talking about other sessions we were also supposed to attend maybe with our respective group and so on. So, we'll try to get more information at the leadership level, with staff. We'll try to see what kind of proposal we can have or alternative and using the input we got today.

I think, with this, maybe again move to the next item and that's about the meeting with the Belgian data protection authority that happened a few days ago. I guess most of you already read the blog post. Janis probably can provide more details from his side but he is not with us today, so I cannot myself share more than that. We are also missing Eleeza.

Anyway, if there is any question or comment here. I see Franck, Chris, and then Georgios. Franck, please go ahead.

FRANCK JOURNOUD: Yes, thank you. Hopefully, you can hear me well. This is Franck Journoud from the IPC. I think it is imperative that both ICANN Org and Janis give us more details on the meeting with the Belgian DPA. I think it's obviously useful to have had the blog post that was posted yesterday [inaudible]. Little information is better than no information, but I have to imagine that more was said [than just a couple of paragraphs] that we got on the substance. So, [inaudible] extensive recount of what was said during the meeting would be greatly appreciated.

RAFIK DAMMAK: Thanks, Franck. Georgios?

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GEORGIOS TSELENTIS: Yes. Hello. As I was present at the meeting, I'm happy to get more questions but I would like to say that, more or less, what is in the blog summarizes what was discussed. I would like to emphasize broadly that the points that were raised there—and particularly, I want to stress the position of, the roles of Janis and myself also that are in this meeting. So, Janis was there for presenting all the work that has been done inside the EPDP. So, it was clear that the Belgian DPA, also from the answers that we got in the first letter, they wanted to have a more clear picture about the policy/procedure that is leading to the models—the possible models—that we have on the table for WHOIS and that's why Janis made a presentation also of what is currently in our initial report.

So, also from my side, I was there with my colleagues from the commission trying to facilitate the interactions between the initial questions that were posed with the first letter from ICANN to the Belgian DPA and it was a technical meeting overall because you have to understand also that this is rather a complex system, and for the DPA, they have to understand in order to give any type of answer, they have to understand better who is responsible and for which [processing] activity.

I don't want to go to the details, but there were some useful interactions there. Primarily, the first one is again the Belgian DPA repeated that it was not—their reply was not intending to stop any further work towards a specific direction of centralized or decentralized. We said it also from the beginning when we saw

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the letter back in December and this was one of the main messages that was conveyed again to ICANN.

The other thing was that there were again discussions regarding the degree of automation. And again, the Belgian DPA said that all this depends on the specifics of how the model works. Don't take for granted that automation is banned, that you cannot do anything like this. You have to go to the nitty-gritty details [and more] you get clarity on those.

But what they also said—and I think I need to convey this very clear—is they said that their role is not to endorse a model. They are not the ones that are going to say, “This is a good model.” They can only make some observations and give back some advice for us to be sure that we are on the good track when we are pursuing the models. The models will have to come up by the policy that we are developing here.

So, this is in summary what happened there. If you have more questions, please I'm happy to respond.

RAFIK DAMMAK: Okay. Thank you, Georgios. We have Amr, Marc Anderson, Mark SV, and then Franck. Amr, please go ahead.

AMR ELSADR: Thanks, Rafik. I had originally raised my hand to support what Franck said earlier, but actually Georgios's explanation right now is extremely helpful and I think he's answered most of the

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questions that I had. But it does raise another one which I was also thinking.

I am personally hesitant in thinking that input from any DPA, whether it's the Belgian or anyone or data protection authority from somewhere else, based on a presentation or a summary of our work. So, I was wondering if it was discussed during that meeting—and maybe Georgios can help with that—if there was any discussion on the DPA potentially reviewing the initial reports in any detail and providing any input on that during the public comment period or even the possibility of reviewing the final report and recommendations during the time when presumably these recommendations will have been sent by the GNSO Council to the ICANN Board for consideration. They will be in a more final state at that point.

But if there is some sort of plan—I don't want to offer a word as strong as commitment but if there's some kind of plan for the Belgian DPA or the DPA from any other EU member state to perhaps conduct a sort of review of our work ... And like Georgios said, it's not to say, "Okay, this model works. It's great." But to actually just provide specific feedback on some of the recommendations that we're providing, I think this would be extremely valuable.

Absent that, I'm honestly not sure what the value is in DPAs providing input on summaries or webinars or presentations. Like Georgios said, and the DPA pointed this out I'm sure during the meeting, they need more information. They need more information on the context of automation within the proposals we come up with. They need more information on who the actual controller for

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every single processing activity might be. And they won't get this information from presentations. Thank you.

RAFIK DAMMAK: Thanks, Amr. Mark?

MARK SVANCAREK: Mark SV for the transcript.

RAFIK DAMMAK: Sorry, Mark. It's Marc Anderson before and then you.

MARK SVANCAREK: Okay. Well, just remember my hand was up previously. Thank you.

RAFIK DAMMAK: Yeah. Sure.

MARC ANDERSON: Thanks, Rafik, and Mark SV. I was perfectly content to let Mark SV go first. But I'll jump in. First, Georgios, thanks for the color around that. I found that helpful. I found the blog post to be very high level. I had a hard time pulling something out of there that was actionable for our work. I guess that's ultimately what I would like to have come out of these conversations, to get something actionable or beneficial to help inform our work. And I had a difficult time getting that from a blog post.

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One thing in particular I'd like to specifically ask—and Georgios, you may be able to help a little bit with that—is towards the end it talks about a centralized model, specifically. I'm not clear what is meant by a centralized model. Is this referring to a centralized model where a central body possesses all the data, so it's a truly 100% centralized system where a central authority possesses all the data and is able to do a balancing test and decide how to disclose that data? Is it a centralized model, like what we've described where there's a central portal but the data itself and some of the decision-making still resides at the registrar level? That's not really clear to me. Without that clarity, it's hard to be able to take that sentence and extrapolate that into information useful for our work.

The other thing, it says the centralized model is worth exploring and seems to be a better common-sense option in terms of security and for data subjects. But it doesn't say better than what. So, this here, I'm having trouble understanding the context of this and how that could be helpful to our work. So, Georgios, I hope you can provide a little context around that in particular.

A couple other things real quick. I'm wondering, is this the last meeting or will there be additional meetings or further follow-ups planned? I don't know if you have any information on that. That would also be helpful.

One last thing. I think what Amr was asking, or at least similar to what Amr was asking, I'm wondering if DPAs, if we know if the Belgian DPA or anybody else intends to comment on the initial report that's currently out for public comment.

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As I recall, in our phase one work, we did get comments but they came in after the comment period, so I'm wondering if there's similar intent for the Belgian DPA or anybody else that we know to provide comments that may be helpful to our work. Thank you.

RAFIK DAMMAK: Okay. Thanks, Marc. Mark SV, Georgios, and then Hadia. Mark SV?

MARK SVANCAREK: Thanks. I want to make two points. The first of them is in agreement with Marc A that I found this blog post to be really completely unhelpful. It's very high level. You see in the chat lots of questions about the ambiguity of specific words. I don't know. It just added no value other than to say we had a meeting and they didn't yell at us too much. I would hope that we can do better in the future informing people about what was actually discussed in addition to just generalizations of what they said.

And that goes to the second question. I feel like there was one important question that needed to be asked and that was about the allocation of liability, based on the allocation of processing. I don't think that that requires any technical explanation of the SSAD at all. I don't think that it requires an understanding of any of the other policy decisions that we're making. I think you can just simply say there's one party that's performing 6.1(f) balancing test and then there's another party that's doing every single thing else. Let's talk about how that works out from a liability framework.

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Thomas mentions that all you need is a DPIA and that would be my agreement. I'm not even sure you need a full DPIA to ask that question and get a meaningful answer. I certainly can't tell from this blog post whether or not that question was asked. That was the most important question, from my perspective. So, I thought that the blog post was unhelpful. Thanks.

RAFIK DAMMAK: Thanks, Mark. Georgios?

GEORGIOS TSELENTIS: I will try to answer if I remember all the points. I will try to answer what was raised by the colleagues. To the question whether the Belgian DPA intends to comment on the report, no. They will not. And I think it was clear that they don't believe this is their role. However, they offer to answer specific questions if they have the necessary background information to help because they understand and they are willing to help.

So, if they have a specific question and they have all the necessary background information, informally they might do it—or more formally ... I mean, we have the possibility also as commission to ask formally the Board a question, but I think we are very far away from something like that.

If I go to what Mark SV has said about the basic, the elephant in the room, which is the liability, which is linked to responsibility which is linked to the controllership. Again, there were some exchanges in this issue about joint controllership and what that means. But I must say that my understanding is that the European



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Data Protection Board is as a Board now, and not only for WHOIS, is going to publish very soon some guidelines regarding the controllership and how people can clarify some more difficult issues because they understood and this is I think ... When we present it in more ... To the extent possible, the details of the hybrid model. So, they had an idea there, and as soon as we're getting to the details about who is liable in this case and who is responsible, and therefore who is liable for this case, it was not something that people could answer on the fly like this.

So, what they answered with regard to that was that a general framework, we could expect [inaudible] debated at the European Data Protection Board guidelines, as I said, for the controllership—joint controllership—and the likes. This is not the last meeting. They didn't say. But they did say that please come with something more structured with a background and with specific question.

So, that was what I could say regarding the discussions and the willingness of the Belgian DPA to be involved in our current work. So, don't expect that they will read our report and they will come back with comments about page number X or whatever. So, this is not what they are going to do.

RAFIK DAMMAK:

Thanks, Georgios. We'll close the queue here with Marc since I think we need to move on and probably—

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HADIA ELMINIAWI: I'm sorry, Rafik. I have my hand up and you said that I'm going to speak after.

RAFIK DAMMAK: Hadia, I said we will close the queue with Marc, so you will speak I was making clear that we'll try to move on after this to go through other agenda. So, we have you and Franck and Marc. But just closing the queue in order to manage the time here. Yes, Hadia, please go ahead.

HADIA ELMINIAWI: I'm sorry, Rafik. I thought you were talking about the previous Mark. Unlike some of the previous speakers, I did find the feedback from the DPAs helpful. As Georgios highlighted, the DPAs are not going to tell us what model to adopt. This is our job.

However, they did highlight two important principles. The first is that a centralized model is better in terms of security and in relation to the data subjects.

And to Mark's point, better than what? Okay. So, when we say centralized model is better, then it would be better than a decentralized model. That's my take.

The second important principle that they also highlighted, that the GDPR would not prohibit the automation of various functions in an [access] model. It is not how the disclosure decision is made [inaudible] to be able to demonstrate that any algorithm automating decision-making. That means that an algorithm automating decision making is an acceptable concept—an

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acceptable method—of decision making. So, they go on saying that any algorithm automating decision making should consider the criteria required for such a decision to be compliant for the GDPR.

So, they did give us two important principles. Whether we would like to build on those or not, this is our job. Whether we would like to explore a centralized model or not, this is our decision. Anyway, we have already agreed on a hybrid model and not a fully centralized one. And again, we have a clear sentence that says having an algorithm for automating decision making in itself is acceptable. It's how this algorithm works and complies with the GDPR. Thank you.

RAFIK DAMMAK: Okay. Thanks, Hadia. Franck and then Marc Anderson.

FRANCK JOURNOUD: Hopefully, you guys can hear me okay. I'll just state, rather bluntly, or let's say candidly, a point of process. I think it's very clear to anyone who's been following the EPDP that we are starving for legal guidance, and while we all recognize that neither the EDPD nor the Belgian DPA may provide that guidance, in a [time and in volume] that would fully satisfy all of us, we still desperately need it.

So, I think it is tremendous that ICANN Org and Janis and some of the [inaudible] and Georgios were able to meet with the Belgian DPA. I think we desperately need more than a blog of essentially two paragraphs and a few oral comments that may or may not, to

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use the exact words that were used and fully convey the nuance and the detail, to the extent that there was nuance and detail in that discussion, but I imagine that it must have been at least an hour-long meeting, covered more than just what we have in those two paragraphs. I cannot imagine that ICANN Org and/or Janis wouldn't give us a fuller, as detailed as possible, account, using the [inaudible] of all the participants in writing of that meeting, so that on that basis we can have a longer substantive discussion here with those that did attend the meeting asking follow-up questions [inaudible].

I do appreciate that it just happened a couple of days ago and Janis isn't here, etc. But I trust that very soon we will be able to going to that kind of feedback.

What we have [inaudible], I actually disagree with Mark SV. I think it is helpful but it is 1000 miles short of being [inaudible] or what we really need or I think what we can get [inaudible].

RAFIK DAMMAK: Okay. Thanks, Franck. Marc Anderson?

MARC ANDERSON: Thanks, Rafik. First again, thanks Georgios for the additional information. I appreciate you being able to provide that context. I do want to respond to a couple of things real quick.

First, I am concerned that we've heard that there's not enough data to provide more advice, and [inaudible] who the controllers are, who's doing the different processing activities. Has it been

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defined anywhere? I hear Stephanie's voice in the back of my head saying we need to do an impact assessment and we know that there's an ongoing effort based on the recommendations from phase one to enter into data processing agreements and that work is outstanding.

That said, I'm concerned about what it means for our current work. If there's not enough detail in our current draft implementation—sorry, our current draft recommendations—what does that mean? Does that mean we need to have more details in there? Does it mean we're leaving critical details to the implementation phase? And if so, what are those critical details that we're leaving out?

Hadia talked about an algorithm. We can have an algorithm. That's great that we can have one, but in our work, we've not defined an algorithm. We've not given any specific direction on how an algorithm could make a decision, could make an actual determination. You might argue that we have included some information. If you have same jurisdiction law enforcement requests, that could be automated. We're pretty vague there. Beyond that, we haven't provided any information on how an algorithm would actually make a disclosure determination. We can't just refer to a magic algorithm that uses AI to decide this. We have to actually give that algorithm inputs and data—instructions on how it'll make that determination. That we haven't done.

So, I would ask us what does that mean for our work? Are we saying there won't be an algorithm or are we saying that that algorithm will be developed in the implementation phase and that we're fine with leaving it to implementation?

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I've said this before. I'll say it again. Where we're expecting decisions or work to be done in implementation, I think we need to be very clear on that in our recommendations, that we expect it to be done in the implementation phase. If we're not clear on that, it makes it very difficult for the implementers, both ICANN and the IRT team.

Finally, just in closing, I hope we get a chance to hear from Janis on this topic on a future call. Since the very beginning of our phase two work, we've looked for and wanted to get input from DPAs, from data protection authorities, for legal advice. We identified very early on that expert advice on this topic is critical to our phase two working recommendations. I hope we have this on the agenda for a future meeting and that this isn't the end of the conversation. This is a critical piece of our work and we can't just say, "Oh, we talked about it on the 20<sup>th</sup> and we're done." It needs to be a topic we continue to discuss. Thank you.

RAFIK DAMMAK:

Thanks, Marc. And thanks, all, for your comment, and also to Georgios for the summary and details he gave. I believe Janis will follow-up with more details and summary from his side, as he attended the meeting, and we can schedule for more discussion on this topic also on the mailing list. This is just, for us, an opportunity as we got that blog post and we didn't want to—how to say? We wanted to provide that opportunity for all to discuss, but not in depth since we are missing Janis. Anyway, I think it's time to move to the next item. We are quite late here in terms of time. It's already 45 minutes on this call and we are still on basically the first substantial agenda item.

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Let's get an update from legal committee, and that will be with Becky. Becky, please go ahead.

BECKY BURR:

Thank you. And sorry for being slow taking myself off of mute. The legal committee met. We reviewed the legal questions. We determined that the question regarding reverse lookups was no longer relevant given the decision with respect to that matter in the report.

We agreed that we would recommend proceeding with the SSAC question on the ability to rely on representations regarding the distinction between legal and natural persons. We think that is an issue that ICANN has been asked to study and the question of the extent to which you can rely on representations and what kinds of actions would be necessary we think remains relevant and useful to get the information on.

The remainder of the questions we are still working on and we'll likely come back. I don't know. We're attempting to focus them a little bit more tightly in light of the policy decisions that have been made to date. So, that's my report.

RAFIK DAMMAK:

Thanks, Becky. Yes, Amr. Please, go ahead.

AMR ELSADR:

Thanks, Rafik. And thanks for that, Becky. I have a question on the legal versus natural issue. As we've discussed a number of

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times—and this is also included in the issue description that staff prepared—one of the issues with legal versus natural is the inclusion of personal information of a natural person within the registration data of a legal person, meaning that if a legal person is registering a domain name, there still may be personal information of a natural person included.

So, I just wanted to ask or make sure that the legal team is capturing this in whatever it's conveying to legal counsel. I see Becky said yes, so thank you for that, Becky. I appreciate it.

RAFIK DAMMAK:

Okay. Thanks, Amr. And thanks, Becky, for the update. I think it's also important to remind about the role of the legal committee here in terms of reviewing the questions proposed by the members of EPDP team.

As now we are discussing the priority two issue, I think the legal committee will be responsible for reviewing the previous legal advice and also proposing a path forward, a proposal, a recommendation for the team to consider.

I think it's important to also remember that legal committee will [inaudible] all those legal advice, like redaction of city field and so on.

Just also want to here to highlight that we proposed this team to be a group of attorneys from the EPDP team and we agreed to have this representative structure for this legal committee with one representative from each group within the EPDP team.



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So, just want to [inaudible] for the leadership working group is that since we have this as this ... The legal committee as a representative group, if anyone is interested in the legal committee work is to channel any input on legal questions through the representative. We also expect that the members of the legal committee to keep their group informed about the work. So, this is just really to try to help us in terms of the work. This is kind of a reminder about why we set up this legal committee and the expectation in terms of working methods.

Okay. Saying that, I guess we can move to the next agenda item, to go through the priority two items. Basically, the proposed work plan will be there will be [inaudible] take into account the changes. But for now, this is what we have as a draft and that will be introduced by Caitlin to brief us about the proposed work plan. Caitlin, over to you.

CAITLIN TUBERGEN:

Thank you, Rafik. So, this is the proposed timeline for dealing with the priority two items. And as Rafik had noted and as Berry had noted in the chat, you'll note that between now and March 24<sup>th</sup>, on the EPDP leadership and staff support team have gone through the meetings, but the meetings that we were scheduled to have in Cancun as well as the normally scheduled EPDP team meetings and legal committee meetings and divided up the priority two topics amongst those meetings.

As Berry had noted in the chat earlier, the priority two items are not on the critical path to get the final report published in time. And beginning on March 24<sup>th</sup>, as noted, that will be following the

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deadline of public comments received and the team will start going through the public comments received at that point.

So, just a reminder of the priority two items. The hyperlinks that you see on the screen link to the worksheets that the team had been—or small groups within the team had been—working on since I believe it was May and June that we started working on these.

So, you'll note that the accompanying table that has some yellow highlighted text on it shows the proposal that leadership came up with to move forward on these items. That's just a starting proposal for the team's discussion, and of course if anyone has any objections or alternative considerations, they are welcome to provide them to the list. In fact, we welcome folks to start discussing items on the list where possible and not necessarily waiting until the dedicated meeting to discuss those topics.

RAFIK DAMMAK:

Okay. Thanks, Caitlin. So, let's see if there are any questions or comments. Yes, Marc Anderson, please go ahead.

MARC ANDERSON:

Thanks, Rafik. Caitlin, you mentioned that the priority two items are not on the critical path for getting the phase one report out. That got me wondering what are the items that are on the critical path and how are those accounted for in the planning.

I know there's a handful of items that we sort of tabled for the initial report. I think I did see it on this list, but we do have sort of a

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commitment to talk about other use cases that could potentially but automated. We talked about having a conversation on what our expectations are around recording. I know SLAs are a conversation we also committed to have after public comments came in. And I think there were probably a couple items that we have discussed talking about either after the initial report went out or after we received input and public comments.

So, I guess I'm asking two things. Is that accounted for in this plan here and does staff have a list of all the items that group agreed to defer or otherwise pick up again after the initial report went out for public comment?

Maybe I'll just add a third one in here. It's probably worth our group being on the same page as to what we do consider to be on the critical path to having our final report complete.

CAITLIN TUBERGEN: Thank you, Marc. Rafik, I can respond to that if you'd like.

RAFIK DAMMAK: Yes, please, go ahead.

CAITLIN TUBERGEN: Thank you, Rafik, and thank you for those questions, Marc. In response to the question about the automation use cases, you'll note in the schedule we do note that we will have a small group formed of those interested in discussing the automation use cases in parallel.

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In terms of any topics that were tabled, what we have on the table represents what the staff support team and leadership have put on the proposed schedule. And if you think anything is missing, please feel free to flag those items and we can add them to the calendar. Thank you.

MARC ANDERSON: So, if my recollection is that we agreed to talk about SLAs more after public comment and we also agreed to talk about what reports we would require, I'm not seeing those things on this list and I should provide that as feedback to staff. I'm also hearing you do not have a list of any other items that we agreed to defer and talk about later. Is that correct?

CAITLIN TUBERGEN: There are two items that were specifically called out in the public comment forum. Those were the mechanism for the evolution of the model as well as the SLAs that were proposed. So, we should be receiving more feedback in the public comment forum that the team can use to further discuss.

But if there are other issues that you don't see that are called out in the schedule and priority two items, please feel free to flag those.

RAFIK DAMMAK: Thanks, Caitlin. Margie, please go ahead.

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MARGIE MILAM:

This is the first time that I've heard that we're not considering some [inaudible] path for the final report. As far as I know, this should cover all the issues. There's no phase three of the EPDP. So, any issue that is still outstanding needs to be included before our final report is actually considered a true final report.

I would really have a concern about this notion that some things are not on critical path. Either they're in our charter and are things that we have to deal with or they're not. But I really don't think this group wants to move into phase three. I think we have to resolve all the issues—or decide that we're not going to tackle them, then. So, we can't assume that we can go ahead and publish a final report just because it meets the timeline that staff has suggested when we have issues that are still outstanding that need to be addressed. So, I just want to flag that. But I think that's a new concept that I wasn't aware of and I don't think it's consistent with the whole PDP process.

And then the other thing I wanted to point out is that I think further issues that need to be considered, I don't believe we ever resolved the ICANN purpose from phase one, purpose to as it related to the ICANN purpose. I know we have the purpose for the third party submitting [inaudible]. But I think we probably have to add that to the topics that need to be considered.

RAFIK DAMMAK:

Thanks, Margie. I see Berry and then Volker. Berry, please go ahead.

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BERRY COBB:

Thank you, Rafik. I'm going to try respond to some of Marc's comments as well as Margie's comments. I think we have been very clear about the timeline. Each month we produce the project package that contains a summary timeline. It illustrates that there are priority two items there and has a footnote that if we can't get these resolved in time, they will not be included in the final report for the SSAD.

That doesn't mean that work can't still continue on priority two items. But in addition to the timeline as well, it's very clear now that come June 30<sup>th</sup>, our critical path is the final report on the SSAD. The topics within the initial report are all of those that are included in that critical path in addition to the automation use cases. As Caitlin noted, if there are some other topics that we haven't discussed, as far as staff understands, we don't believe there are others, but if there are, we need to know about them now, but they should have already been considered in the initial report.

June 11<sup>th</sup> is our deadline and, as I've noted in our last face-to-face, we lose funds to continue this effort in its current form, meaning things like an additional face-to-face or additional legal advice and all of that.

The primary task of this group is to deliver that final report on SSAD to the GNSO Council. A deliverable to that will be a summary of these priority two items that may or may not have been addressed. If we can address them by March 24<sup>th</sup>, we can fit them in because we can hold another public comment period on those priority two items and get them fit into our final report to deliver to the council.

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The secondary deliverable is those items that we did not finish or that the group cannot come to consensus on or we run out of time. EPDP leadership, as well as the full group here, will put together a status report on that and take that back to the council for their consideration on how to move forward on the remaining topics. But we won't have a chair after the end of June, and ultimately it's up to the Council to decide how these remaining topics get addressed--if addressed at all. If there's not any close indication of agreement or consensus on some of these topics, then we're going to need to provide rationale on why it's important that the work [continue be on June] into the following fiscal year.

That said, if there are some remaining items, I would suspect if there's a continuation of the phase two group, loosely noted as phase three but it's not really phase three, then it would probably be converted over into a normal working group, just like our other [inaudible] PDPs.

Again, it's not really phase three work. It's a continuation of these particular topics but I think that there needs to be a summary of the rationale on why that work needs to continue. Thank you.

RAFIK DAMMAK:

Okay. Thanks, Berry, for this. I think it's clear that the timeline and the schedule [were all flowing], that what was shared when we adjusted it with the GNSO Council [inaudible] with the expectation that we will deliver the final report by June. And we know that challenges with covering the priority two items—and that's why we [inaudible] work plan, so it's important to take that into account and to have that in mind. If we cannot, we will have to refer to the

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GNSO Council as it's the chartering organization and it will make decision on how to deal with this. This I think is an important point to have in mind that we have this timeline and to have to go through it if we want to deliver.

Okay. So, we have Volker and Margie. Volker, please go ahead.

**VOLKER GREIMANN:** Yes, thank you. Just one thing to Margie's earlier point regarding the ICANN purposes. I thought that we had come to some form of conclusion by asking ICANN what part of that day to day action do you really need and the response was at the time that they don't really need that data.

Of course, there is certain work that's currently interrupted by the lack of access to WHOIS, such as the [inaudible] project and similar ones, but even there we didn't get any feedback, even though we asked for it. I think it was also asked for in the phase one to have some feedback from ICANN.

My position at this point is if ICANN wanted that data, they should have gotten off their behinds and asked for it and made some more indication that they want that data. Not answering to our requests is an answer enough itself. Thank you.

**RAFIK DAMMAK:** Thanks, Volker. Margie?



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MARGIE MILAM:

Just to clarify what Volker was asking about. I wasn't talking about the OCTO purpose. I see that as something on the chart for further discussion. I'm talking about the general ICANN purpose, compliance and all that sort of stuff, which was covered in purpose two, the one that both had the ICANN purpose and what was considered [inaudible] with a third-party purpose. So, that's what I think we need additional discussion is to clarify what happens to the first part of that purpose two.

Actually, the reason I raised my hand is I think we're in a different scenario now where, given the ICANN Cancun meeting being cancelled, that timelines may and resources needed to get this done may need to be reevaluated.

Obviously, none of us want to work longer than we need to on this project, but I think it's an artificial constraint and there's nothing in the PDP guidelines that require this to be finished at the timeline staff proposed. And granted, at the time it was put together, we were working under assumptions, like we would have a face-to-face in Cancun.

So, I don't think that there's a hard, fast date. We can go back to the GNSO. We could ask the Board for more funding, if necessary. ICANN is not going to not support a PDP if it's still continuing to do its work, especially the kind of nature of this EPDP that is still high profile and important. So, I just want to raise that. That shouldn't be the reason we don't have a final report that includes the issues that are especially addressed in our charter. If they're in our charter, those are things that we need to address and ensure that the final report includes them.

RAFIK DAMMAK: Thanks, Margie. Milton?

MILTON MUELLER: Yes. Speaking of somebody who has been involved with ICANN from the beginning, one of the things that we were told when we were creating ICANN was that if we did not have consensus on a policy, we simply wouldn't make a policy. This principle was actually fundamental to the nature of ICANN. It was supposed to be consensus-based policy, and when people pointed out, well, there are many things in which you will never get agreement, the answer was, yes, in those cases, we will not have a policy and people will go their own ways and do their own thing.

It seems to me that we are reaching a point at which it's becoming obvious that either certain people have to alter their positions or we will not have consensus. And if there is no consensus and we run out of time and we run out of money, then somebody explain to me what's wrong with just not having something that we can't agree on the nature of. What is it that we would do as a default?

My understanding is that the current arrangement would stay in place and we would not have the kind of SSAD that people are expecting but we would still have a method for requesting disclosed data.

But I think we really do need to be confronted with the fact and the threat, if you will, that if people don't come together and agree on a reasonable system that can make everybody—that everybody

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can live with—then we’re just not going to have system. That’s the way it should be. That’s the way it’s supposed to be.

So, let’s keep that in mind as we’re debating. People are just not going to get everything that they think they want, and if they don’t agree to make the fundamental adjustments and compromises that are necessary by the deadline, then we’ll have nothing.

RAFIK DAMMAK:

Thanks, Milton. To follow-up what Berry just wrote in the Zoom chat, [inaudible] from GNSO Council standpoint as the Council had a strategical planning session and it was clear that the management of the PDPs [inaudible] sticking to the timeline. We don’t want repetitive extension from the first timeline and we want the PDP working groups to deliver.

So, I really want to reiterate that. We committed last November when we submitted the project change request to GNSO Council for confirmation that we wanted to deliver by June. So, we know about the challenges with the priority two items, and if we want to get that, we have to reach consensus and to make progress.

Okay. I’m not seeing anyone in the queue, so I guess there is no further comment here. Caitlin, do you want to add anything further? Any requests?

CAITLIN TUBERGEN:

Nothing from me, Rafik.

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RAFIK DAMMAK: Okay, thanks. I guess, with that, we can move to the next agenda item, and that's starting priority two items, [inaudible]. That's about the display of information of affiliated versus [privacy and proxy providers].

So, here we have the worksheet, including all the information and the material and input we collected previously. So, I would ask here, Caitlin, just to give a quick briefing, a reminder about this worksheet, that we [inaudible] material for us to discuss this topic. Caitlin, please go ahead.

CAITLIN TUBERGEN: Thank you, Rafik. I'll note on the table that we distributed, which has all of the priority two topics, again those do link to the worksheets and I would recommend everyone familiarize yourself with those worksheets because it includes a lot of useful background information.

But, in short, this topic was something that was held over from priority one. There is a recommendation in the phase one final report about affiliated privacy and proxy services. And when the group discussed this, because the privacy and proxy services accreditation implementation was paused and we were obviously on a truncated timeline, the team wasn't sure how affiliated versus unaffiliated privacy-proxy services would be possibly tagged in RDDS. So, we had that as a question to send to the staff supporting that project.

So, in early December, we received a response from some of the staff that is supporting that project, noting that all accredited

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privacy and proxy service providers would be tagged as such, using some sort of label—or at least that’s the proposal that would go out for public comment, that the Privacy Proxy Implementation Review Team had recommended.

I would also note that the staff supporting that project had also noted that in the privacy-proxy services final recommendation, that affiliated and unaffiliated privacy-proxy service providers are to be treated the same in terms of accreditation requirements.

So, I will note, as I mentioned earlier, that the yellow highlighted text within the worksheet represents the next steps proposed by EPDP leadership. And in this case, there is a draft recommendation for the team’s consideration that’s highlighted in yellow and it notes that following the implementation of the PPSAI recommendations, the EPDP team recommends that EPDP Phase 1 recommendation #14 applies to all accredited privacy and proxy services.

Thanks for feedback. Over to you.

RAFIK DAMMAK:

Thanks, Caitlin. So, let’s go first with Marc Anderson and then Brian. Marc, please go ahead.

MARC ANDERSON:

Thanks, Rafik. I guess I raised my hand because [inaudible]. My recollection was of the discussion is that when we tabled this issue in phase one it was because we were not sure that there would be a clear way to know in the RDDS output if a registration

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was a privacy-proxy registration or not. My recollection is that was our primary concern. We had a number of discussions about that it would be problematic if, looking at the RDDS output, you could not tell if something was privacy-proxy registration or not.

I think that was the real question I thought we were looking for. When we got the answer to our question back in December, I read that response as being that the privacy-proxy recommendations would include a recommendation that would lead to a clear indication in the RDDS response if the registration was via a privacy or a proxy service. So, I think that was ... My recollection is that was our main concern.

I guess my question to the group is does that jive with everybody else's recollection of what our concern was? I have not had a chance to digest the proposed staff recommendation, so I'll maybe hold my tongue on that one, but I guess I just wanted to bring up that my recollection was our main concern was we over whether or not it would clear a registration's privacy-proxy registration or not. If it was not clear, then I think there was a feeling from some in the group that we needed a recommendation that it does be clearly indicated. But interested in what others have to say on this. Thank you.

RAFIK DAMMAK:

Thanks, Marc. So, we have Brian, Volker, and then Mark SV. Brian, please go ahead.

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**BRIAN KING:** Thanks, Rafik. I wanted to confirm that my understanding was the same as Marc's, that that was the concern and that concern was addressed by the fact that accredited and not merely affiliated, but all accredited privacy-proxy providers or services, if they were used, would be visible either through some kind of binary flag—I think most likely through that kind of flag, either is this or is this not privacy-proxy data? And that that would be available to the registry.

So, that was my understanding. I think that's been addressed and we would support this recommendation as proposed by staff. Thanks.

**RAFIK DAMMAK:** Thanks, Brian. Volker?

**VOLKER GREIMANN:** Yeah. Just one comment. I've been mulling this in my head and the services are still being used but their usefulness has been greatly diminished and the introduction of the SSAD will probably not change that very much. I think privacy-proxy services are probably services that are on the way out or going to have a very diminished existence in the future compared to what they used to be because, basically, they fulfilled for many registrants the same objectives that are not being filled by GDPR and the implementation of GDPR by contracted parties.

Therefore, there is doubt in my mind that the accreditation program for these services is still needed anymore going forward, similar to the question whether thick or thin has not been basically

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decided by GDPR and our proposed model but that's the question that has to be discussed at another time.

I think that maybe our recommendation should be that the PDP be reopened for just a brief reevaluation of the recommendations of that group to make sure that they stood the test of time, so to say, that they're still valid and that they're still necessary or whether they can be scrapped at this point. I think it's a valid concern that has to be raised.

RAFIK DAMMAK: Thanks, Volker. Mark SV?

MARK SVANCAREK: Thank you. I think it's a giant leap of faith to say that privacy-proxy services re going to go away. They're being offered, in many cases, free of charge or by default. There's no reason to deactivate those systems. There's no real reason to assume that they will be deactivated and certainly it does provide a second level of protection if you're seeking a second level of protection, even in the context of SSAD.

And of course, right now, there's a huge number of registrations that are behind privacy and proxy. I think it's like 40%. I don't see why we would take this leap of faith. We say, "Well, those will probably go away, and therefore we don't have to do anything about this given the large number of registrations that are masked behind privacy-proxy right now." So, I would advise against making that assumption and proceed with the recommendation already put in place. Thank you.



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RAFIK DAMMAK: Okay. James, please go ahead.

JAMES BLADEL: Thanks. Just to respond to Marc. I don't think it's a question of a leap of faith or an assumption. I think it's more a recognition that we are recreating many of those features and functionality and values of a privacy-proxy service in the SSAD itself.

So, I think the concern is why buy a cow when you can get the milk for free sort of situation. Most of what we're seeing currently in terms of remaining privacy-proxy registrations are due to the lack or absence of a system like SSAD, and once that is rolled out in a uniform manner that covers all registrants equally regardless of their geographic location, I think that Volker's assumption becomes correct. Why do we even need these anymore? Thanks.

RAFIK DAMMAK: Thank you, James, for this clarification. Chris, please go ahead.

CHRIS LEWIS-EVANS: Thanks, Rafik. I'd just like to respond. What I heard from Volker was the most likely scenario is that [they will] go away and the impact of that really is the privacy-proxy work that has been done that is stilling waiting implementation. Does that need to be reviewed? Do we need to add into this proposed recommendation the fact that this should be reviewed once SSAD model in place

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that effectively provides the same services as the privacy-proxy? I would certainly like to see that addition in there. Thank you.

RAFIK DAMMAK: Okay. Chris, I'm not sure if you finished or you had some issue, but I guess we can move to Brian.

BRIAN KING: Thanks, Rafik. Just to focus us here on what our job is, this is a rollover item from the first phase when we were determining what data would be public and we agreed then that privacy-proxy data would be public because personal data should not be natural person data. I think our mission here is just to confirm that that's the case now that we have information about the fact that these can be identifiable at the registry level when the data is provided.

I do agree that the utility of having privacy-proxy services is lower now that we've confirmed which data will be publicly available. I don't agree that there will not be a need for privacy-proxy services, if I could put on my contracted parties hat for a moment. MarkMonitor has many clients that do new brand launches and need to registrar domain names without identifying who the owner is and there are plenty of other perfectly legal and reasonable uses for privacy-proxy data.

So, let's not assume that this will go away. I think our job here is merely to confirm that the privacy-proxy data for accredited privacy-proxy providers will be made public and I think that's just something we can probably all agree on. Thanks.

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RAFIK DAMMAK:

Okay. Thanks, Brian. So, trying here to take into account all the comments that [inaudible] and the Zoom chat. I think the purpose is really to [inaudible] the narrow scope. I don't think we are supposed to speculate about the relevance [or not] of the proxy and privacy services. So, we are trying here to work on what's leftover from phase one. So that's why it is kind of on the worksheet trying to describe here.

So, I think folks should be on [inaudible] recommendation. As several comments made, maybe later on things will change, but I don't think it's our role here to revisit work or review another policy. As you're likely aware, that's work that's now [with the] GNSO Council and they are [inaudible] recommendation #27.

So, I guess let's think [inaudible] my understanding of what I got from the comments. Okay. [inaudible] comments in the chat. Thanks, Brian.

I don't see anyone in the queue, so I assume there is agreement around this. If there is no further comment for that, I guess we ... Okay.

I think no further comment and sensing what we heard, I guess next step will be the team members to review the draft recommendation, and if there is no support, just to [inaudible] the list and come up with alternative language.

So, from what I hear today, I think that we might reach [inaudible] quickly. Also, if there is no objection, we can [inaudible] to put it out for public comment. That's quite positive [outcome], I think.

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Thank you, all for this. I guess, with the same spirit, we might cover several priority two items. Sorry if I look tired. It's getting late here.

So, we can move to the next agenda item, but I was reminded that I forgot one request and that was for volunteers for this small team to work on automation use case for next Tuesday. So, please, if you want to volunteer for that, just put your name and staff will follow-up. I understand that some already added maybe in the spirit of [inaudible], but please do so and we will have this small team to work on the automation use case.

With that, let's go to the next and the last agenda item and that's to [inaudible] reminders about the next calls and also probably, as you know, you can [inaudible] the topics that we will try to cover. Caitlin, can you please give us some update on this?

CAITLIN TUBERGEN: Thanks, Rafik. Sorry, I missed your question. Are you asking me to give an update on what's going to be the topic for the next meeting?

RAFIK DAMMAK: Yeah, just to remind everyone to prepare. We presented the issue list to explain what we are seeing as the next topics. Just to remind everyone since I think we have two calls for next week.

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CAITLIN TUBERGEN: Yes. Thanks, Rafik. So, as you can see on the agenda, the Tuesday call is dedicated to the small team on use cases and we note that some folks have been volunteering in the chat and we will take note of that. Please also feel free to write to the list if you'd like to be a part of that team so that we can include you.

Per the calendar for the Thursday plenary meeting, the topics on deck for that are data retention as well as the feasibility of unique contacts to have a uniform anonymized email address. For those topics, I would recommend again please click on those hyperlinks in the document that you received to review the information on data retention as well as the feasibility of unique contacts and anonymized email addresses in preparation for that meeting. And you'll note that the highlighted text is the proposal for next steps. If you don't agree with those, you're welcome to write to the list in advance of the meeting to get the discussion going. Thank you.

RAFIK DAMMAK: Okay. Thanks, Caitlin. Brian, please go ahead.

BRIAN KING: Thanks, Rafik. If I could make a friendly suggestion for that. I have a question about the February 25<sup>th</sup> automation use case small team and that's ... Let me ask that first. So, my question there—maybe that's a question for Caitlin or for anybody from staff—is that supposed to be a legal-minded conversation about which use cases we think have potential for legal cover for automation or is that supposed to be more of a technical conversation about what

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kind of things technically could be automated? Then, if I could park that question for one second while I have the mic.

On the February 27<sup>th</sup> call, I would just note as a friendly suggestion here that I think data retention is going to be very non-controversial and I think with the legal advice that we just got from Bird & Bird on the feasibility of the unique contacts and uniform anonymized email address, as a spoiler alert, we're not going to be able to fight to do that based on what Bird & Bird said. So, I foresee those being pretty short conversations, and in the interest of time, since we don't have a time flagged to come up with an ICANN purpose that we need to do, maybe we could add that to the agenda for that meeting since the rest of it looks like we can deal with in pretty short order. Thanks.

RAFIK DAMMAK:

Okay. Thanks, Brian, for that suggestion. I think that we can take that into account for preparation for next week. And thanks to everyone for volunteering for the small team. You wanted to [inaudible]? Please go ahead.

CAITLIN TUBERGEN:

Thanks, Rafik. I just wanted to respond to Brian's first question about the composition of the small team for the automated use cases. So, in terms of that team, because the draft recommendation notes that the automation needs to be both technically feasible and legally permissible, we're not restricting it to one or the other. So, technical and legal folks are welcome to join that team.

RAFIK DAMMAK: Thanks, Caitlin. Okay. So, no one in the queue and I think we covered all the last agenda items. Thanks, Milton, for the comment. I guess, if I'm not ... I'll double check. I think we covered all, so I guess with that we can adjourn the call for today. Thank you, all, and see you soon.

UNIDENTIFIED FEMALE: Thank you, everyone. Once again, the meeting has been adjourned. Please remember to disconnect all remaining lines and have a wonderful rest of your day.

**[END OF TRANSCRIPTION]**