

---

## ICANN Transcription

### Registration Data Accuracy Scoping Team

**Thursday, 09 December 2021 at 14:00 UTC**

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 are posted on agenda wiki page: <https://community.icann.org/x/5gC7Cg>

The recordings and transcriptions of the calls are posted on the GNSO Master Calendar page  
<http://gnso.icann.org/en/group-activities/calendar>

TERRI AGNEW:

Good morning, good afternoon, and good evening. Welcome to the Registration Data Accuracy Scoping Team taking place on Thursday, the 9<sup>th</sup> of December 2021 at 14:00 UTC.

In the interest of time, there'll be no roll call. Attendance will be taken by the Zoom Room. If you're only on the telephone, could you please identify yourself now? Hearing no one, we have listed apologies from Jeff Bedser. We have no alternates listed at this time. And joining a little later in the call will be Olga Cavalli.

Statements of Interest must be kept up to date. If anyone has any update to share, please raise your hand or speak up now. Hearing no one, if you do need assistance, please e-mail the GNSO secretariat. All members will be promoted to panelists for today's

---

*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.*

---

call. Members, when using chat, please select everyone in order for all to see the chat. Observers will have view only to the chat.

All documentation information can be found on the wiki space. Recordings will be posted on the public wiki space shortly after the end of the call. Please remember to state your name before speaking. As a reminder, those who take part in ICANN multistakeholder process are to comply with the Expected Standards of Behavior. With this, I'll turn it back over to our chair, Michael Palage. Please begin.

MICHAEL PALAGE:

Thank you, Terri. And yes, Volker, as noted in the chat, it does seem we have a light turnout today as there seems to be heavy participation. I've seen a lot of ICANN folks, including our ICANN Org colleagues in a number of IGF sessions. However, we need to get to our work. So as usual, I'll start with a quick update from an administrative standpoint. Actually, this is item number four in the agenda. Based upon the Doodle poll, we are going to be going with next week's meeting being realigned or readjusted to Thursday at 13:00 UTC. Terri, can you confirm that was the output of the Doodle poll and that is how we decided to proceed? Is that correct?

TERRI AGNEW:

Thank you, Michael. Everything you've stated is correct.

---

MICHAEL PALAGE: That is good. It would not look good if I did it. Okay. So again, I just wanted to give that, the quick update. In the interest of time, I want to jump in and try to continue to move forward with the questions we have from the various stakeholder groups and the questions that we will be proposing to ICANN Org. So, Marika, would you be driving that document?

MARIKA KONINGS: Sorry. I got to get over to the mute button. Yes, I'm happy to do so. So on the screen is the latest version. We had some additions that came in I think late a yesterday. If I recall, well, I think we left off here last week on Question 14 from the IPC.

MICHAEL PALAGE: Okay. So I see Scott is on the call. Lori, welcome back. And Lori, thank you. I know you are taking time away from the IGF so much appreciate it.

LORI SCHULMAN: Sure.

MICHAEL PALAGE: If I can, Marika, before we start jumping in and handing the floor to the IPC to continue with their questions, the revised document where you were going to group the questions, you're just going to wait until we get through this list before preparing that grouping, or have you already started that?

---

MARIKA KONINGS: No. Correct. I think we maybe did briefly mention that to the group. But the idea would be once we've gone through the list of questions that basically we would take them and try to organize them in a way that they make maybe more logical sense, because I think some questions are closely related or may focus on certain aspects. So it may make it easier as well for our colleagues to respond to those in that way.

I do know that we had a couple of folks that said after discussions last week that they were going to make some updates to the questions, but we haven't seen anything. So this is probably also a question if further updates are still expected. Those should have been in already because I think our objective is to basically clean up this list grouped together, and hopefully, by the end of today, share it back with the group just to make sure that we didn't leave anything out, that that was in there or organize it in such a way that you have concerns about so that it could be submitted as the final set of questions by tomorrow. I believe that was the plan. I think that's where we're currently at. There are some additional questions that were added that probably people haven't had a chance to look at yet. So I'm assuming that we'll just continue on to those once we've covered the ones that were submitted in time by last week's meetings. I think we have to IPC and SSAC questions, and I think a couple more from the ALAC, and then there are I think five additional questions that have been added by the BC.

MICHAEL PALAGE: Excellent. Thank you very much for that detailed update and sharing with the group what will be taking place. In the interest of

---

time, I want to turn the floor over to Lori and Scott. Which one of you would like to present Question 14 to the group?

LORI SCHULMAN: Is there any way to blow this up? I can't read it. I'm sorry.

MICHAEL PALAGE: Yeah. For us that—

LORI SCHULMAN: I also wanted to just mention I had started typing something into the chat and we can table it, but I wanted to get it out there before I forget. Because I think that our colleagues on the Contracted House side might just know the answers, and then I can relay them back to the IPC. We wouldn't necessarily have to ask them of ICANN staff, of the Org, or Compliance. We had our general IPC meeting last night and there were two questions from the floor. We were explaining the task at hand with the questions to Org.

So the two questions we got from the floor, there was uncertainty. Apparently, there was a form called a WHOIS Accuracy Complaint that you could fill out at ICANN Compliance and you could file the complaint. Compliance would process this complaint, reach out to the contracted party, ask them for confirmation that the facts stated in the complaint were valid, and if is so, data would either be corrected or the domain could be suspended. And it was called a WHOIS Accuracy Complaint. It wasn't clear if this form is still

---

being used or if the cessation of the data transfers also affected the use of this form.

I see Sarah put the link up. Sarah, are you aware if there are active complaints using this form? Or is this something we should be asking ICANN Compliance like how many complaints have they gotten in the last three years using this form? Something like that.

SARAH WYLD:

Thanks, Lori. If I could just jump into answer. I do not have any information about the rate of complaint beyond what ICANN Compliance publishes. I think they recently had their most recent update come out so we might be able to find stats there. I do know that this process is still in use. Yes, people do still submit registration data complaints to ICANN.

So the first link that I sent was ICANN's general for the Compliance page with many different types of issue listed. Then the second link, honestly, I've never used it. But it seems to be the form that you're referring to that somebody could fill in to say the data is incorrect. So I hope that helps. Thank you.

LORI SCHULMAN:

Sarah, that's extremely helpful. I will convey that back to IPC Membership. As I said, there's a little bit of confusion about whether any of this is operable. I think we could start sorting that out. That's an easy one to sort out. So great. Thank you.

---

The second question that came from IPC members during our general membership meeting yesterday was about an issue regarding cross field validation that there had been, at some point, discussion about whether or not there's any cross-field validation going on. Again, I think this is something that contracted parties could answer and we wouldn't necessarily have to go to the Org. Thanks, Sarah. Thank you.

SARAH WYLD:

Thank you, Lori. Sorry, my hand is actually up to go back to the Compliance rates for the inaccuracy because I found their October report. So I'm just going to drop that link right there.

LORI SCHULMAN:

Great. What I'm going to do is I'll just cut and paste all of these links and I can formulate an answer to our membership. Owen, yeah. Is Owen allowed to answer? He's alternating then he's part of our group so I don't see why Owen couldn't answer. We'll just clear this up and, Michael, we could move the work along.

MICHAEL PALAGE:

So if this will help us speed our work along, I don't know if I have the authority to allow Owen to speak since all three are there, but I have no objections to allow Owen to speak on this particular issue as an alternate. ICANN Org, am I allowed to do that as sharer? Somehow have I violated some issue? Okay.

---

MARIKA KONINGS: I think you're fine, Michael.

MICHAEL PALAGE: Okay. I just read the playbook and I read the rules. So, Owen, and as an alternate, can you please speak to this issue? Thank you.

OWEN SMIGELSKI: Thanks, Michael. I'd like to follow up a little more to Sarah partially answer the question when she provided the link to the October 2021 Compliance dashboard report there. From that link, you can go back if you just get rid of where it says you can change, get rid of the [inaudible] stuff, go back and see the whole thing. But if you note in there, and Sarah said that it's now called Registration Data Inaccuracy is the complaint type. Just over a year ago, Contractual Compliance went from using a Kayako system to going to the Naming Services Portal or NSP for processing complaints. And as part of that move, they got rid of all the individual complaint forms that used to be on ICANN's website. It was 5-10 different complaints in the website. They were getting a lot of wrong complaints in the wrong areas. So there's one unified complaint form now that I think was also dropped into chat. So those all feed in there, and you can select an option now for whether Registration Data Accuracy. But as you see there, it's still a pretty decent sized bucket of complaints for compliance. You can go back and you can look that over each of the months about how many complaints they are. So they are indeed receiving them. You can see some of the reasons of why they're being closed as well, too, in those complaints. Thanks.



LORI SCHULMAN: Okay. Thank you, Owen. I think that is super helpful. I will report all of this back to our members. I appreciate the indulgence, but I feel like as long as we can get these practical questions answered, it will save time in the long run. So we can find areas of mutuality and we're not repeating information or we're burdening staff with questions we can answer among ourselves within the group. So thank you very much. I do appreciate it.

MICHAEL PALAGE: Lori, before you start, if I could, I would highly encourage you or I would highly encourage everyone in the working group to please listen to the ICANN Compliance session from ICANN72. Owen accurately stated that one of the things that they have begun to do is they have begun to list how complaints are closed out. One of the proposed questions that I ask was for a list of all of the different classifications for closing it out. Because if you look from month to month, the basis on how complaints are closed out, changes. I found it incredibly enlightening on a personal level when I listened to that one-hour Compliance session. So I would really encourage everyone to listen to that. I think you will find it incredibly enlightening. With that, I will turn the floor back to you, Lori and Scott, to move forward with your questions.

LORI SCHULMAN: Okay. I will move forward with our questions, not to miss the lineup anymore. But actually, we have one more question for the contracted party colleagues. Maybe I'll ask it offline to the list. It

---

---

might be the most efficient way to do it. And perhaps that will help. So be prepared. I'll send the question out after our meeting. Oh, now Sarah says, "I can handle this." All right.

So I was thinking about the questions that we're asking Org. I was thinking about the overall task we're trying to do. And I'm understanding—I've heard what the contracted parties are saying in terms of where they feel their hands are truly tied in terms of what the contracts actually say. The new constraints we have under a raft of privacy laws, whether it's under California law or European law, we hear all that, we get it.

From a business perspective, from a governance perspective, there is the concept of due diligence of auditing, of making sure whatever business practices are in place are checked and ensured that the intentions and the functionalities that are part of the process, whatever it would be, whether it's an accounting audit, a business process audit, or in the case of what we're discussing, an accuracy audit. And one of the questions I had, this had not come across this specifically in any reading, is whether or not given the constraints right now and the absence of ICANN Compliance doing the old ALS audit, if the contracted parties themselves do internal audits and if they're doing these internal audits, are they published anywhere? Is there any sort of self-policing going on that we could look to as a best practice where this information could be gleaned without thinking about data transfers per se in terms of ICANN actually doing the auditing?

I can leave it there and we can talk about the answer another time. But this is something that's been top of mind for me. Because I look at auditing and making sure a system works as

---

just good business. Period. Whether we're talking about compliance with a particular contract, particular reason, that's one thing. But there's also just the practicality of running the business and making sure that the information that you're handling is the correct information and it's fit for purpose. I wonder how much of that is done internally.

ALAN GREENBERG: Several people have their hands up.

LORI SCHULMAN: Okay. I can't see the hands. I'm sorry.

MICHAEL PALAGE: Okay. I myself also. Let me go back. I see the hands up. Sarah, you have the floor.

SARAH WYLD: Thank you. Lori, that is a great question. I think it's part of the core of what we need to be discussing here today so I'm glad that you raised it. This question of whether there is due diligence and auditing to make sure that the business practices are working—working to ensure accuracy of data. I do consider that that is already fulfilled by existing obligations. So when a registrar collects registration data, that is a new set of information that has not yet been verified, they are required to perform verification. They contact the domain owner by phone or by e-mail and say, "Is

---

this the correct info?” and the domain owner says, “Yes, it is.” So in that moment, we are sure that the registration data is accurate.

Then if the data changes to something that has not been verified, verification must be performed again. So any new dataset is verified. And in an ongoing basis, there is an annual confirmation that the data remains accurate. I received such an e-mail, actually, just the other day for my own personal domain that I own. It said, “Hey, you own this domain,” gave me the domain name, gave me the whole registration dataset, and reminded me that if it was inaccurate, it is my obligation as domain owner to update it. So that makes sure that in an ongoing sense, the data remains accurate and inaccurate data is addressed. If that message bounces back, showing that the e-mail address it was sent to is not valid, that triggers the WHOIS Accuracy program that requires that within 15 days that data be updated or the domain be suspended. So I think that these due diligence and auditing requirements are fulfilled.

Now then your other question is whether metrics are published and I don't think that that is the case. I'm not sure about the value of those metrics. And so that's something that we might consider. But right now, I don't believe that that information is published. I hope that helps. Thank you.

LORI SCHULMAN:

Thank you, Sarah. Yeah. Particularly on the second point, I think that's helpful to know. And yes, I've received those messages, too, for my own personal domain portfolio. So I'm aware that the elements are being checked, but how they're institutionally

---

monitored across the Board, I think is an interesting question. I appreciate how you've answered it.

MICHAEL PALAGE:

Okay. Next up in the queue is Steve Crocker. But before turning the floor over to Steve, Sarah, one of the things you mentioned was that if there is a bounce back, there is a triggering. I went back to the WHOIS Accuracy and I did not see that. In reading the policy, all I saw was that—or at least the documents I was reading—there only needed to be the e-mail sent. Is that follow up, if you get a bounce back, is that just a Tucows practice or is there another document that ICANN has provided to registrars on best practices on that? I did not see that. I was hoping that was in place but would you elaborate a little more on whether that's a Tucows or every registrar does that?

SARAH WYLD:

Thank you, Michael. No, that is a standard part of the WHOIS Accuracy Program Specification. I'm just looking right now to see exactly where it's at. Okay. So if we look at the spec—and I'm going to put the link in there so everyone can easily find it—it's number four. "If registrar has any information suggesting that the contact information specified above is incorrect, such as registrar receiving a bounced e-mail notification or non-delivery notification message in connection with compliance with ICANN WHOIS data reminder policy." That right there. That's what I was talking about. Thank you.

---

LORI SCHULMAN: Thanks.

MICHAEL PALAGE: Excellent. Okay. Steve, you have the floor.

STEVE CROCKER: Thank you very much, Michael. All of that is very good. Sarah, thank you very much for the very detailed recitation of the process. There's no question that Tucows practice is topflight. It does lead to the question of how uniform is the actual conformance with that across the set of registrars, so that in addition to what's required of the registrars, there is a natural question of how to monitor and check that it is in fact being carried out at a satisfactory level across the entire spectrum of the registrars. So that's one point that I wanted to make.

The second point which is related is the suspension of the ARS because the data is not available strikes me as a non-problem in the following sense. It surely isn't acceptable purpose for ICANN or a designated agent of ICANN to get access to all of the registration data for the purpose of checking the accuracy. That certainly has to be one of the legitimate purposes under GDPR and every other privacy regime. And so I don't understand why that process has to be suspended. All that has to be done is for ICANN to have access into the databases, not necessarily only to the publicly available data. Thank you.

---

MICHAEL PALAGE: Okay. If I can, just mindful of time, we've I think almost consumed a third of our time here today, and I think we're still on the first IPC question. I think this background discussion is important and I'm not going to rush it. Yes, I had been listening to feedback from the group members. So I want to complete this discussion but I do want to remind everyone that is a number of questions that we still need to get to. So with that, Alan, you have the floor.

ALAN GREENBERG: Thank you very much. I will try to be concise. In terms of the responding to bounces, Sarah's answer is interesting because I've also been told at various times over the last couple of years that registrars are not obliged to trace bounces and make sure that they're working. So it's encouraging that the words are there and at least some registrars are doing it. I'm wondering to what extent it is actually done on a regular basis.

One other comment, Sarah said that the reminder process is a confirmation. It's not a confirmation. It's a reminder. There's no way to know if the registrant even really looks at the e-mail, never mind responds to it and says, "Yes, everything's okay."

Lastly, in terms of Steve's comment on the suspending of the ARS, my understanding from ICANN Org is they suspended it because they could no longer implement the process they had before, which was looking at the public WHOIS records. I don't believe there was any attempt. I don't know what discussions they had, but I don't believe there was any attempt to continue the program by accessing the data by requesting it from registrars instead. So my understanding was suspended purely because

---

they could not continue as it was. And I don't believe there was any attempt, certainly none that I've heard of, to continue it using some other methodology. Thank you.

MICHAEL PALAGE: Okay. Sarah, you are going to be the last in the queue on this topic and then I will be turning back to Lori and Scott to move forward with the remainder of their questions.

SARAH WYLD: Thank you so much, Michael. I really appreciate the opportunity to respond. So getting back to what Steve first said about how is it monitored and checked, a couple of points on that. Number one, registrars must annually self-certify their compliance with the RAA. So, I can't really speak to every registrar's practice. At the two that I've worked for, that was a very intensive self-audit, where we went through every provision of the RAA and made sure that we were fulfilling everyone before sending that certification in. So hopefully, everybody has such a robust program in place.

Number two, ICANN can audit registrars. So that is a great way to monitor and check for compliance on these things. ICANN does regularly audit registrars, and perhaps the next audit would include confirming that the WHOIS Accuracy Program is being adhered to. Then you mentioned that surely it would be acceptable under the GDPR for ICANN to get access to the registration data to check accuracy. So setting aside the question of how they would go about checking accuracy other than doing the same thing registrars do, which is contact the domain owner



---

and say, "Give me accurate data," setting that aside, it may be the case but there are other things that need to happen around that before ICANN can receive personal data from the registrar. So firstly, ICANN must be part of some kind of contractual agreement such as a data protection agreement that would set out how the data gets processed. That is not currently in place. Then secondly, if the data is being transferred from within the EU or the EEA to a third country, there needs to be an appropriate protection mechanism in place if that country doesn't have adequately set it. So, none of that exists right now. So setting aside the operational question of how it would be done, there are still for the legal and regulatory questions or things to address before that data can be shared.

Then, okay, back to what Alan said. You're told that registrars are not required to trace bounce backs. I have not heard that. I'm very curious about what that's referring to. So if you do have more information on that, I would love to see that perhaps on the list. What I described is standard practice. And I will say you are correct that there is no way to make sure that the domain owner reads the e-mail. That is true. That is the same issue that we have with terms of service. People don't read them but they're still legally binding. Thank you.

MICHAEL PALAGE:

Lori, Scott. Thank you for that, Sarah. I see no further hands. So, Lori, you have the floor.

---

LORI SCHULMAN: I will stay on track. Promise.

SCOTT AUSTIN: Thank you. Thank you, Michael, but I defer to Lori. She has presently IPC and she's doing a fine job. So thank you.

LORI SCHULMAN: Thank you. So these last two questions from the IPC go to the relationship with WIPO and how staff members are actually assessing complaints. In full disclosure, we took these, particularly 14, from the suggestions from Mike and just to paraphrase a little bit. But I thought that this question was on point. And also in full disclosure, I did speak with Brian Beckham, too, about what WIPO was doing, if they're keeping any statistics on, and what they're finding. Because right now, they're one of the few entities that is receiving information that could perhaps be checked for accuracy to make sure it's operational and fit for purpose in terms of the UDRP.

So our question is regarding ICANN's relationship with ADR providers, there's a specific WIPO proceeding that's quoted that says, "The panel has detailed multiple, inaccurate disclosures regarding the registrant of the domain name in question and other 'misconduct' by the respondent and the registrar. The panel has further ruled that this is an issue the panel believes should be addressed by ICANN. And the panel requests that the Center"—meaning the WIPO staff—"share this decision with ICANN so ICANN may consider whether to impose restrictions on such behaviors."

---

So we were wondering if WIPO ever contacted ICANN Compliance, if any resolution had happened. So what Compliance contracted is so does ICANN Compliance have a formal reporting channel for UDRP purposes specifically and URS providers to share information regarding false or inaccurate registrant data. So we'd like to know if there's an internal process going on. I think it would be helpful for the studies in this side of this group.

Then generally speaking, we definitely are curious about when accuracy complaints are received, how ICANN staff are handling them, and whether or not they're trained on assessing the complaints in a particular way, are there guidelines? And how is that quality of review assessed? So this goes to two points. Is there a flow right now between WIPO and ICANN? And then when accuracy complaints are looked at, are there standards that are applied? Or is it simply situational to an individual?

MICHAEL PALAGE: Okay, Lori, thank you for detailing that question. Are there any comments, concerns regarding the inclusion on this, or can Lori move to her next question from the IPC?

LORI SCHULMAN: Scott's hand is raised. Yeah. Sorry, Mike. I see Scott has raised his hand.

MICHAEL PALAGE: Scott?

SCOTT AUSTIN: Thank you, Michael. I just want to say that the case that Lori's referencing is I'm also a panelist, it was written by David Bernstein who's one of the best panelists on UDRP there is. It's a very, very well-written decision and I would commend it to every member on this group because it also speaks about the ownership of a domain name by both the proxy service and registrar and wearing multiple hats. And I think that that situation is something that needs to be considered. This is something that I was not totally aware of until I read the decision. It's extremely well-written, covers the things we're talking about in this group very well.

MICHAEL PALAGE: All right. Thank you, Scott. I agree that it was one of the more interesting UDRP decisions that I read and did touch on the ownership, but our scope is with regard to accuracy. So I just want to make that a note. I just want to see no more comments from anyone on the floor. So Lori, could you please move to the next question?

LORI SCHULMAN: I don't see it. I see 14 and 15. I had put them in all together. I think I put in like five. So they probably should all be lumped up unless we want to slide up. But those could have been covered last week. I have not listened to last week's recording so I don't know Scott went over the first one or two.

---

MICHAEL PALAGE: Yes, Scott did go. Yes.

LORI SCHULMAN: Okay. Then we're done. And we're on to SSAC.

MICHAEL PALAGE: Excellent. Thank you. We're picking up some speed here. Thank you very much, Lori. Okay, Steve, Jeff is not on the call so I will let you speak on these questions that were submitted. You have the floor, Steve.

STEVE CROCKER: Thank you. So there are three questions there, 16, 17, and 18. So 16 focuses on what are the accuracy requirements for each of the data elements as opposed to a single specification covering just one notion of contact. Just for clarity, listed the four levels of validation that correspond I think, essentially, identically with everything we've discussed. It's not intended to insert new notions in terms of that scale. When I say the expected answers are v2 for phone or e-mail, v1 for country code and v0 for all other data elements, I understand after I wrote that, that that was interpreted by some people to say that's what I was trying to say the answer should be. That's not what I was trying to say in using the term "expected". I was trying to say this is what I understand or the current policy to be and what I expect the answer would be coming back from ICANN, not what we're trying to say the status should be. So what I was trying to say there is that I'm expecting ICANN to say that operational validation is required for the phone and/or the e-mail, whichever one is being dependent upon, that

---

syntactic validation is required for the country code and that, in essence, no validation of any kind is imposed on any of the other things. Now, I can be wrong, which is why I'm asking the question, but I'm just saying that's what the expectations are.

The next question may sound a little weird because the entire focus of these contracts are sort of what are the requirements, but there is an implicit issue as to whether or not registrars are permitted to do more work and validate the information at a higher level. This is potentially useful on behalf of the registrants because it then means that the registrant can say this data has been validated. And it could also be a method of differentiating the level of service that different registrars provide. So this is just for clarification that the higher levels of validation are permitted and to get that to be explicit. It's possible to read the language is saying, "No, this is exactly the level and you must not do more," which would be a kind of negative interpretation of that.

The last question is, is it required for the registrars to be explicit about what level of validation was performed on the data that they provide when they answer the request? That could either be in the form of explicit tagging or simply a covering statement that says, "This is our uniform practice and you can depend upon that every response we give to a query has met these conditions." So it's not an implementation thing that requires going through the entire database and making huge changes. But in any case, what I've said there is I'm expecting that the current state of affairs is that there is no information provided about the level of validation. But in this case, I am suggesting that the answer should be that there

---

is an explicit level of validation provided for each and every one of the data elements that is responded to. That's our input on that.

MICHAEL PALAGE: Okay. We can hit pause here, Steve. I see Volker. Volker, you have your hand up. You have the floor.

VOLKER GREIMANN: Yes. Thank you. Ultimately, these are very easy questions to answer because the answers for each of these are basically in the RAs which are Registry Agreements that exist and supplemental answers, of course, in the existing policy. So we should be able to answer them very quickly without having to ask ICANN on those. For example, Question 17 is already answered by various registries, having voluntarily committed to various levels of accuracy that go beyond the standard requirements listed out in the RA. Various registrars have various know-your-customer obligations from local law that they have implemented that might affect the accuracy levels and the requirements that a registrar chooses to implement versus its customers. So Question 17 I think is already answered that way. But we can, of course, be more explicit in that.

Question 18, you're absolutely right, the expected answer no is correct because in the application and various audits, the registrars and registries are basically only required to provide answers that match the requirements of the RA or the Registry Agreement. Therefore, a level of verification is not required. We

---

just have to basically outline how we match those requirements that already exist in the various agreements and policies.

With regard to question 16, that's a bit more complex, but also easily answered. There's a difference between the accuracy that is actually required of the registrant and the accuracy that is required to be validated. Obviously, we require in our agreement that all data is 100% accurate. And if it's not, then the registrant is required to update or fix that. So ideally, we would basically have a requirement versus our customers that is between v1, v2, and v3. However, the requirements from the Registry/Registrar Agreements are very much lower than that. So basically, there is a high level of required accuracy that we are required to pass on to our customers. But ultimately, we're not required to verify that when it happens. Only when we receive validation requests or inaccuracy requests then higher levels might be triggered. But those are rare and those are not standard process. Thank you.

MICHAEL PALAGE: Steve, do you want to respond?

STEVE CROCKER: Yes. Very briefly, Michael. Volker, thank you very much. With respect to the last point, you make a very clean and important distinction between what the accuracy requirements are versus what the validation requirements are. I'd like to reword 16 and replace the word accuracy in the first line there with validation requirements. Because I agree—I think we all agree—that in principle, the registrant is supposed to supply accurate information



---

and that there's no issue, no alternatives to that. And the focus is really what steps are taken to assure that accuracy, and so that's the validation process. And so the real focus of the question is, what are the validation requirements for each of the data elements? So then I think we're in agreement on that. As I said, this deserves to be answered in some detail, is my expectation. My understanding is that operational validation is required for the phone or e-mail, syntactic validation for only the country code so far as I know, but I'm not 100% certain of that. Then no validation of any of the other data elements, it's just expected that what's provided is accurate, but there's no process in place to provide any assurance of that. Thank you.

MICHAEL PALAGE: If you could, briefly, Volker?

VOLKER GREIMANN: The answer for that question is basically part of the 2013 RAA, which basically outlines in the WHOIS Accuracy Specification what the level of verification and validation are. Essentially, e-mail or phone must be operationally validated and syntactic validation is in place for other fields as well, where they have to meet certain format requirements as in UPU standards, I think it is, Uniform Postal Union. I'm not quite sure what the abbreviation stands for but that's where it is. There are certain format requirements that have to be validated and certain verification requirements that concern e-mail or phone. But that's all in the RAA and we can basically look it up there.

MICHAEL PALAGE: Thank you, Volker. If we can, Steve, I want to get Marc on, and then you will have the floor because you still have more SSAC questions. So you will be having the floor. I just want to provide Marc the ability to get in here real quick.

MARC ANDERSON: Thanks, Michael. I said in last week's call that I think we should be able to ask what questions we want to ask. But I guess as Sarah put in chat, the answers to these I think are pretty well documented in our background material. I guess I'm wondering what your purpose for asking these questions is. I feel like we have the answers. So, you're asking for ICANN Org to confirm your understanding based on the background material? Are you expecting that there may be a conflict between what we have and what ICANN thinks?

I guess I'm a little uncomfortable asking questions that sound like we haven't done our homework. I am a little uncomfortable pushing it back at all, Steve, because I feel like any of us should be able to ask what questions we want to ask. But I do feel like these have been answered so I'm wondering why you're asking these questions that seemed to have been answered already.

STEVE CROCKER: I guess it's time for me to respond to that. I appreciate Volker and Marc. The essence of your answer is it's all there. Did you read the documents? There's a ton of documents. Not all of us are at the same level of understanding. There's a lot of history there. So

---

---

that's one aspect. Another is that not everyone would have the same understanding even if we've touched and delved into those documents over time. I appreciate that those of us in this group who come from the contracted parties necessarily spend a great deal more time on those documents than perhaps others of us had. I think there's value in simply bringing that data to the surface, presenting it in a uniform fashion that is accessible to this group. I understand, in principle, that means doing a little work that might be viewed as unnecessary because it's a repetition. But nonetheless, I think it would be valuable and helpful so that we have a common base to work from. Thank you.

MICHAEL PALAGE:

Okay, Steve. Let me address Marc's comment there. In the interest of time, Marc, at this point, I'm going to allow all the questions to be read into the record. As part of the duplication and reorganization that ICANN Org will do, I will consult with them to see whether a question has been asked or answered. And we will then bring back a final formulated list to the group to do a final walkthrough. At this point in time, I'm not saying that it is going to be included. I am similarly stating that it is not going to be included in any final. I'd say it stays in for now and we make that determination as a group when we do a final read through. Steve, if you could, please—Sarah, you have your hand raised.

SARAH WYLD:

Sorry to interrupt your train of thought there, Michael. Thank you. I did just want to speak to the question you put in chat so I'm happy to wait for the appropriate time for that.

MICHAEL PALAGE: Yeah. I know. You can respond to me or—I want to get to everyone’s questions. That’s why I actually put it in chat to be most respectful of everyone else’s time. Steve, you have the floor.

STEVE CROCKER: I’m not sure why I have the floor, though. I think I said what I wanted to say.

MICHAEL PALAGE: So you’ve read through all of the questions 16, 17 and 18?

STEVE CROCKER: Yes.

MICHAEL PALAGE: Okay. Sorry. My apologies for multitasking. If we could scroll through. Alan, it appears that you are going to be—Scott, you have your hand raised. Is this in connection with one of Steve’s or SSAC’s questions?

SCOTT AUSTIN: Just to make a note that goes in the chat and before we lose it, Sarah was kind enough to put up a link to the ICANN dashboard. And in scrolling through some of the materials that were there, and there’s a lot there, but within the definition of an accuracy, it basically is tracking complaints. It did include identity. I just

---

thought that that was important to note because we're looking at the scope of what is being measured with regard to accuracy and inaccuracy.

MICHAEL PALAGE: As I said, I would encourage you, Scott, if you do get a chance to view the ICANN Compliance webinar from ICANN72, again, I found it very informative. What happens here is, Alan, you now have the floor.

ALAN GREENBERG: Thank you very much. Question 19 is a reference to something that Lori mentioned earlier, that the RAA calls for consistency check during some fields. For instance, if you give a postal code and a street, does that street really exist within that postal code? There's other various things. The RAA says that they only apply if the registrar deems it to be technically and commercially feasible. My understanding is, in many cases, registrars do not do this. There is record in a few places of discussions that were, in theory, proceeding between registrars and ICANN on whether this needs to be modified or how it's interpreted. Those discussions seem to be at least several years old and it's not clear that they are still continuing or whether there was any outcome to this. I understand from a number of registrars that there never was an outcome and it still stands in the position of the registrar makes a judgment call and in fact many registrars are not doing this. I can't speak to many, most, or whatever. So I'm asking ICANN what is the status of this in all of the aspects.

---

MICHAEL PALAGE: Okay. Real quick. Volker, you would like to respond to Alan?

VOLKER GREIMANN: Yes. Because I was part of that group, I can basically speak to that. The cross-field validation is a big problem. Since we have investigated this together with ICANN multiple times, we have basically come together and had a working group set up that basically analyzed options for establishing that. The result of each and every time that we did that was that it simply was not feasible to establish this on a global scale. You must understand that most registrars are not operating in one jurisdiction only, where it might be simple or trivial to do that. Most are operating on a global scale so we would have to have a service that provides this data for all countries in the world where we do business with sufficient level of accuracy that basically reduces the number of false negatives to almost zero and at a cost that would not inconvenience registrants significantly.

When you take all these requirements together, ICANN and the registrars basically agreed that at this time, it was infeasible. Every time we determine that, we will depart and we expect that in a couple of years, we will have to dance the dance again and look at various options that may have developed since then, which we'll look at. And if we find one that is feasible to implement in a way that does not inconvenience our customers significantly and that does provide sufficient accuracy and that is available for all countries in the world where we do business, then we will implement that. But at this time, no such service exists.

---

MICHAEL PALAGE:           Okay, Alan?

ALAN GREENBERG:        I believe the question still stands for a number of reasons. Number one, for many very large countries, and probably ones which constitutes a huge percentage of registrations, the Postal Service offers services that make this not particularly daunting for postal addresses, which are the most critical one because that's the one with multiple parts where there is a consistency issue.

Number two, if that's the decision that Volker described, that's fine. I'm not going to second guess it at this point. But it needs to be documented. The fact that the only thing I could find on the ICANN website was there are discussions that are ongoing and that document is several years old, it's just not acceptable. So I think it's a valid question.

The second question is on the ARS. Again, we have discussed aspects of it. I want a confirmation from ICANN that they decided to terminate the ARS because they couldn't do it exactly as before. And I want to know whether in fact there were any discussions internally or with registrars about whether the process could be modified what needs to be done. I don't disagree with what Sarah said is required. I consider it rather curious—I use a kind term—that we're several years into GDPR and we don't have any of those things in place. Thank you.

---

MICHAEL PALAGE: Volker, you would like to respond?

VOLKER GREIMANN: Yes. The reason why it's probably not documented is that it's a contractual issue between registrars and ICANN and not directly concern for the community. Even though many members of the community have an interest in that, this is strictly a process that basically relates to the agreements that we have in place, and therefore, it's a process between ICANN and the registrars.

With regards to the ARS, the main issue is how to get the data from the registrars to ICANN or whatever organization is doing the analysis in a manner that is compliant with data protection law. And at this stage, we don't even have the data transfer agreement in place with ICANN. We don't have a controllership agreement in place with ICANN. So there is no legal framework even at this stage. And even though we've tried to negotiate one with ICANN, so far this has not yielded any results. I imagine that once we do have a framework for such data transfers that is legally implementable, then a replacement might be conceivable and then it should be looked at again. But at this stage, we're just not there yet. Thank you.

MICHAEL PALAGE: Thank you, Volker. I just was looking. Stephanie Perrin is not on the line. If she was on the line, I'm sure her hand would have been raised. And in addition to asking for the DPA, she would also be asking for a Data Privacy Impact Assessment. So just want to channel that because I know that is something that she has raised



---

in the last three years of EPP discussions. Alan, you have the floor to continue. Or are you done? I believe you have Question 20.

ALAN GREENBERG:

I already did Question 20 but I would like to respond to Volker. Several things. I understand that there are no data processing agreements and there are no joint controllership agreements, and all of those things have not been done, at least not publicly. They apply to simply answering queries from Compliance also, potentially. And yet, presumably that does continue. There are all sorts of things that have not been done that need to be done. I would like to understand from ICANN what they're doing about it and I'm asking, I believe, is a reasonable question.

In terms of the ARS, again, yes, I understand how it could be fixed. Sorry, I'm off track. The last item is Volker saying this is a contractual matter and none of our business. I beg to differ. If you look at the Accuracy Specification, there was a public comment in 2015 on the Accuracy Specification asking for input on whether it's working, what has to be changed. Both registrars and other people made comments. The report basically said we're not going to do anything right now but we're going to look at it again and we'll propose some changes to the RAA presumably in the next N months. As far as I can tell, that was 2015, six years ago, and it never happened. This is part of our business where even though it's a contractual issue, there's a long history of public comments and input from the public on things related to contracts. So please let's not say they're none of our business. I'd like to go on now.

MICHAEL PALAGE: You may proceed.

ALAN GREENBERG: I'm finished. Volker has his hand up again, but I'm finished.

MICHAEL PALAGE: Okay. Volker, you have the floor.

VOLKER GREIMANN: Just a tiny anecdote, which you might find funny or not. Alan just referenced Contractual Compliance inquiries. I wish we could do what you said. But simply the fact that there is no agreement in place at this stage means that a lot of the data that we send to ICANN Compliance queries is redacted. In many cases, it's really going through the motions, taking the response that we've provided, for example, to a registrant when it's transfer complaint or whatever, and removing all personal data which basically renders—that we've sent into a template and then send that to ICANN with the timestamp that we send it. ICANN is content with that because they understand that we are not able to send the personal information of the registrant such as e-mail address, names and stuff like that, that were contained in the e-mail. The value of that exercise is something that can be debated but that is current practice simply because ICANN is still refusing to come to an agreement with regard to the DPA that we need. Thank you.

---

MICHAEL PALAGE: All right. If I can, I'm going to hit pause here. Marika, can you do a spot check? I believe there were five additional BC questions that were submitted. Is there anything else after the BC? Okay. Toba or Susan, I will turn the floor over to you to walk through the BC questions. If you could get this done in the next 30 minutes so that we could complete this task, I would greatly appreciate it.

SUSAN KAWAGUCHI: Thanks, Michael. Can you hear me?

MICHAEL PALAGE: I can hear you loud and clear.

SUSAN KAWAGUCHI: Perfect. All of these questions are really aimed at what ICANN Compliance is doing and I pulled the italicized wording. It's directly out of one of the documents that we were asked to review. I was not aware until I read this or somehow had forgotten that if the registrar does not receive an affirmative response from a registrant when they were validating, and I'm assuming from this is when they send out the standard e-mail saying, "Please verify your e-mail address and respond," that there's a possibility to manually verify that information. So I was wondering if ICANN can tell us what process is acceptable to ICANN Compliance to verify an e-mail address manually. And is this method tracked by ICANN Compliance? And if so, how many registrations are verified manually? In this case, I'm assuming that unless it was an inaccuracy report to ICANN that they would not be in the middle of this, but when they receive an inaccuracy report and they contact

---

the registrar, do they track the method in which the e-mail address specifically or anything or the phone number was verified independently is the way I read this manually. Not sure how that would work.

MICHAEL PALAGE: Okay. Are you are you done with that question?

SUSAN KAWAGUCHI: Yes.

MICHAEL PALAGE: Excellent. Volker, if you can, you have the floor.

VOLKER GREIMANN: Yes. I'll try to be brief on this one. This is a funny clause because this option was actually negotiated into the 2013 RAA by the registrars. I was part of the negotiation team at the time, and ICANN wanted us to delete the domain name when we don't receive the affirmative response. We said that was not an option. So they came back with suspend or delete, which still seemed to us as causing problems. Because in many cases, not responding within 15 days to an e-mail is not indicative of any wrongdoing. It's just laziness or failure to see the e-mail or failure to react or being on vacation or whatever.

Anyway, we wanted to have an option that if we believe that a domain name is legitimately registered, that we do not have to automatically deactivate it and cause enormous damage if we turn

---

off an important domain name of a hospital, government site, company that is doing business on that site. And therefore, it gave us the ability to go away from that automatism and do more if we felt it is necessary. Especially if it is something that we did for brand registrars, that basically corporate registrars that provide corporate services to corporate clients that have high value domain names and therefore should be protected. It's better than just having a domain name turned off after 15 days if they fail to respond. Because in many cases, we also know those customers personally, we meet them regularly. And just because they don't respond to an e-mail does not mean they don't exist or that the data is correct. So we wanted that in there.

MICHAEL PALAGE: Okay. Thank you.

SUSAN KAWAGUCHI: If I can respond to that. The question is what method? How do you manually verify an e-mail address? So you're saying you know the customer, check, it's fine. Is that how it's done?

VOLKER GREIMANN: Well, I can usually queries that differently. It queries this question the other way around. They ask us, "Why haven't you suspended the domain if this came back negatively?" and then we say, "Well, XYZ is the reason how we verify that. Usually they're content with an explanation, whatever that explanation is, because they want us to show basically all work, to show what we have done to verify that this data is correct, even though we didn't receive the positive

---

response in that time. So they don't ask us in the way that they wanted an answer that says, "Is this sufficient to verify that?" but rather, "Have you done something that allowed you to not suspend the domain name?"

SUSAN KAWAGUCHI: Okay. So it would be good to hear from ICANN whether they track this data—and most of my questions or BC's questions are based on what data are they tracking and what might come out of reviewing that data. So can you scroll up for 22? Or I can go to the other document. Okay. So, the question is—and I just put in the language from the document. But in receipt of an inaccuracy complaint, does ICANN Compliance track the actual days it takes for the registrant to become compliant? Is this reported by the registrar? How many domains are terminated versus suspended? So that's really just data. I'm wondering what data is collected.

MICHAEL PALAGE: Okay. I see no questions about that. So if you want to move forward with your next question, we'll consider including that.

SUSAN KAWAGUCHI: And then 23, does ICANN Compliance require the underlying contact information of a proxy/privacy registration to be validated and verified? If so, are inaccuracy reports treated differently? Is data collected and tracked?

---

MICHAEL PALAGE: It looks like we're going to finish in time, Susan. Until you see another hand come up, which I will notify you, I'll just keep on going. Thank you.

SUSAN KAWAGUCHI: When a registrar provides further information concerning their findings—and that relates to the language above—does ICANN Compliance track this information and look for trends of abuse? And 25, not all inaccuracy complaints are sent to ICANN Compliance. Many registrars suggest reporting directly to the registrar. Are stats on domain names suspended due to inaccuracy requested in an audit of the registrar by ICANN Compliance?

MICHAEL PALAGE: Still no hands. Wait, I do see a hand from Marc Anderson. Marc, your question?

MARC ANDERSON: Thanks, Michael. My question is actually on the previous one. I'm not all objecting or anything, mind you. When you say and look for trends of abuse, I'm not exactly sure what you mean by that. I can maybe make some guesses, but based on sort of the context of the broader question, I'm not quite sure what that means. So I'm just wondering if you could expand on that a little bit, Susan?

---

SUSAN KAWAGUCHI: Yeah. So when you file with ICANN Compliance at least, I'm assuming—I always go to ICANN Compliance. I usually do not go to the registrar. So I understand their system best. You have to point out what you think is inaccurate, right? When you see a domain registration and it's all X's or something you have to say, "Oh, the registrant name appears to be inaccurate," or "The address does not map on Google. It appears to be inaccurate." But abusers who often use inaccurate information intentionally do not use just one registrar. So it'd be interesting to see if—because in the type of work I've done for the last 20 plus years is you can see a trend, you see, "Oh, I've seen similar or exact inaccurate information like this with this domain at this registrar and this registrar and this registrar." So it would be interesting to see if they could identify with the information that they are receiving if they sort of look at the bigger picture and see if there are trends of abuse. That might help identify an abuser. And that might be data we could use that—I mean, it's false. It doesn't belong to anybody, it's not personal information. It's inaccurate information. Correct? So, it would be interesting to know if ICANN sees that if they see information repeated across several registrars if that becomes apparent to them.

MICHAEL PALAGE: Okay. I am seeing no hands, Susan.

SUSAN KAWAGUCHI: All right. Then we're done.



---

MICHAEL PALAGE: Okay. So, what I am going to do here is at this time, I'm going to turn it over to Marika to best understand how we are going to take these questions and wrap them up so we could get them sent off to ICANN.

MARIKA KONINGS: Thanks, Michael. It's a very good question. I can ask the same question to the group. Of course, what we can do is organize the questions, as I noted before, and group together the questions that seem to belong together or focus on a similar topic. So it may be easier for our colleagues to provide a response or build a response that addresses a number of questions. At the same time, as I noted before, based on the conversations we had during previous calls, that there seemed to be some indications that some might want to rephrase their questions or provide more specificity based on the feedback that was already received. Similar during today's calls, some answers have already been provided to some of the questions. So I think the question is also, are all of these questions still relevant and do they still need to be asked? Several made a point as well and asking questions that can be found in the materials that we already have available might not be a very efficient use of time or colleagues to respond to.

So maybe what I can suggest is if everyone can take another look at the questions that were submitted, what updates may need to be made based on the conversations that have been held today and as well during the previous calls, if you're of the view that your question has already been answered and you don't think it's necessary anymore to ask it, feel free to delete it. Or if you think it's already asked in another question, or with a kind of slight

---

nuance, it can be already covered by another question, please do that as well. So if everyone can do that by the end of the week, then early next week, we can then maybe produce this kind of consolidated version. We could work with Michael as well. If there's still questions in there that he is of the view that are clearly answered already and do not need to get asked again, we can maybe separate those out and clearly bring that back as a package to the group for you to review, and then maybe try to sign off on those during next Thursday's meeting, if that's an acceptable and workable timeline. Looking at Michael, I know you had wanted to already get this over to Org by the end of this week. I do know that Brian, of course, is on this call and he has already been looking at these questions. I know that he's flagged already to colleagues with ICANN Org that these are coming. So it's definitely not something that's going to be coming as a major surprise. So hopefully, having the ability to turn your look on at what is there will help already some of the thinking around that. But of course, the later the questions are submitted, the later responses will be received as well. I see Brian's confused. I'll stop talking and he can talk for himself.

MICHAEL PALAGE: Yes, Brian, if you could provide any insight or guidance from ICANN Org's perspective.

BRIAN GUTTERMAN: Yeah. Thanks, Michael. Hi, everybody. No, I don't have much to add in addition to what Marika has said, just reiterating that I've obviously been following and relaying the questions as they've

---

been sort of appearing on the Google Doc to relevant SMEs and colleagues in Compliance. So I'm going to try and answer them as completely and comprehensively as we can and get answers back to you. But this process of answering them together here I think is also a useful exercise. So I think we're just going to see how the questions come in over the next couple of days and how they're finalized. Then, I don't know, we can get back to the group with a better timeline of when we think we can finish our answers for the group to review. I'm happy to answer additional questions that were passed.

MICHAEL PALAGE: Thank you, Brian. Sarah, you have your hand up.

SARAH WYLD: I do. Thank you. My apologies if this was answered already while Marika or Brian was speaking. I was trying to listen but I was also chatting in the chat. Some of these questions seem to be perhaps not entirely duplicative but definitely similar or on similar themes. Will the staff team be consolidating the question so that we are as efficient as possible? Thank you.

MICHAEL PALAGE: Marika, I believe you said that your intention was to try to remove questions that were duplicative, try to group them. I would say my perspective, Sarah, is—I know Marika talked about me potentially resolving some stuff—I do not see myself in an individual capacity, unilaterally removing the question. I think that is something that the group itself should decide. I don't believe I should be making

---

those types of decisions. Just like when I made my list of proposed questions. I don't believe I should, as a neutral chair, be determining what does or does not go to ICANN. I think that is a group call. And that being said, I think I have stated before on the record, given that we are in a fact-finding question, I believe the bar should be set pretty high on trying to exclude a question. I think Marc even alluded to this in his comments earlier. So hopefully, that was helpful. Beth, I see you have your hand up.

BETH BACON:

Yeah. Thanks. Hi, everybody. I was just going to suggest I think Marika was making very good suggestions as per usual. If you can group them by concept, then perhaps ICANN Compliance then, to make their lives easier, can answer like things together so they won't have to repeat anything. But if we could group them that way and let ICANN Compliance know that we understand that they may not need or want to answer every single one because it's not efficient or accurate because they're going to be repeating things. So, where they can group a response, maybe that's fine, if we want to let them know that. That way, we won't remove anyone's questions. Because I agree, if you have a question, ask the question.

MICHAEL PALAGE:

All right. Thank you, Beth. So real quick, just to time check, we have approximately 10 minutes remaining in the call. We do not have time, obviously, to begin the gap analysis. We will obviously start that next week. If I could, Marika, can you perhaps give an

---

update on those stakeholder groups that have submitted their gap analysis already? Could you give a quick update?

MARIKA KONINGS: Yeah. Thanks, Michael. On the screen is the gap analysis, a template where there is space for each group to provide its input. So far, we have input from the Registrar Stakeholder Group, the Registry Stakeholder Group, the IPC, as well as ALAC. The other groups have not provided input yet. So it might be helpful if they could confirm whether they are still planning to do so or whether any of the other submissions are potentially joint submissions or they want to add their name to it. But that's where it currently stands.

MICHAEL PALAGE: Thank you very much for that update. I believe the BC, Toba and Susan, do you see making an individual statement? Or do you see perhaps making a joint statement with another stakeholder group at this time?

SUSAN KAWAGUCHI: Yeah, I'll take a look at this. A lot of this would be duplicated. So I'll just review it again and see if there's something outstanding that hasn't been recognized.

MICHAEL PALAGE: What I would encourage, if you see a stakeholder group that you're closely aligned with, maybe approach them and figure out

---

how to figure out, to come up with a consolidated joint proposal. I would encourage everyone to do that, just so that we can document all stakeholder groups' viewpoints as part of our work. I believe the IPC—Thomas was on and I believe he had to drop earlier in the call. Is there anyone else from the ISPs? I do not see that. So I will follow up with Thomas directly. Melina, do you anticipate the GAC being able to provide any gap analysis before next week's call?

MELINA STROUNGI: Yes. We will coordinate internally, and by next week's call, you will have an answer from us, Michael.

MICHAEL PALAGE: Excellent. Thank you very much. So with that, I want to wrap up. But before I wrap up, Sarah, I want to go back to you. I did not want to cut you off. You and I were multitasking in the chat room as well as I was attempting to moderate. Did I answer your question? I know you said something about discussing it offline but I did not want to conclude this session without giving you a last comment on that question.

SARAH WYLD: Well, thank you, Michael. I thought that I was answering your questions. I don't have any open questions. If you have open questions that have not been answered, then let's take them to the list. Thank you.

---

MICHAEL PALAGE: I'm all for working asynchronously, so no problem there. And with that, I see no further hands. I just want to remind everybody that next week we are going to be having to change. Please make note of that. And with that, I will conclude the meeting. So, Terri, you could stop the recording. I look forward to seeing everyone in some additional IGF sessions. Have a great day, everyone.

TERRI AGNEW: Thank you, everyone. Once again the meeting has been adjourned. I will disconnect the recording and all remaining lines. Stay well.

**[END OF TRANSCRIPTION]**