ICANN Transcription

Transfer Policy Review PDP WG

Tuesday, 18 October 2022 at 16:00 UTC

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JULIE BISLAND: Okay. Good morning, good afternoon, and good evening, everyone. Welcome to The Transfer Policy Review PDP Working Group call taking place on Tuesday, the 18th of October, 2022. For today's call, we have apologies from the RrSG, Sarah Wyld, Theo Geurts, and Crystal Ondo, and from the BC, Zak Muscovitch. They have formally assigned the RrSG Rich Brown, Jothan Frakes, Jody Kolker, and from the BC, Arinola, Akinyemi, as their alternates for this call and for remaining days of absence. As a reminder, an alternate assignment must be formalized by way of a Google assignment form. The link is available in all meeting invite emails.

All members and alternates will be promoted to panelist. Observers will remain as an attendee and will have access to view chat only. If you have not already done so, please change your chat selection from host and panelists to everyone in order for all

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participants to see your chat and so it's captured in the recording. Alternates not replacing a member should not engage in the chat or use any of the other Zoom Room functionalities. Statements of interest must be kept up to date. Does anyone have any updates to share? If so, please raise your hand or speak up now.

Please remember to state your name before speaking for the transcription. Recordings will be posted on the public weekly space shortly after the end of the call. And as a reminder, those who take part in the ICANN multistakeholder process are to comply with the expected standards of behavior. Thank you and over to our Chair, Roger Carney. Please begin, Roger.

ROGER CARNEY: Thanks, Julie. Welcome, everyone. Before we get started, I know that we had a doodle poll sent out last week looking to add another time slot for us weekly to hopefully pick up our pace on comment review and try to get us back on track timeline wise or at least make up some time. And it was pretty clear that the 1600 UTC time Thursday was the preferable time for everyone. So I think we'll, I can't remember starting November 10th, I think staff can correct me if I'm wrong, we'll start adding that extra time slot in. Then we'll send out invites for it, but we'll, again, go with the 1600 UTC time. Correct. Thanks, Emily.

Other than that, I'm not sure there's a whole lot to cover. We ended our last conversations at a fairly good spot that I think will lead us into a good conversation today, and that was Rich suggesting, and maybe me adding some suggestions into that or clarifications maybe, how we can get back to what we think the

comments needed to it, which was giving the registrants the ability to deny a transfer before it actually goes through.

And even though our recommendations obviously allowed that to happen, it didn't provide explicit window. And I think after reading all the public comments on this and even on other ones, it was obvious that we needed to have an explicit window even if it's shorter or flexible, but there has to be a window there. It sounds like from commented from our discussions last week.

I think with that, I proposed at the end of the call last week that we will make a mandatory notification at transfer request or TACK request, whichever you call it. I think it's easier to say transfer request because registrants really don't know or care too much about the semantics of TACK, but they do start a transfer request.

So I think that's probably terms for it. But make a mandatory notification at time that's requested and that modification has to go to the registrant on record. And then we never did agree or I don't know if we even suggested a time window to be given maybe, and that even flexible, maybe we can get some ideas around that.

But I think that that leads us perfectly into moving from recommendation 1 and 2 into our notification recommendation 3. So Again, I dropped that right at the end of the call. So I think I'll open it up with any questions, or comments, or concerns. I think that we can jump into that. Emily has pulled up our rec 2 working document here. So again, this was specifically on the losing FOA, the rec 2. So I think that I'll open it up the floor. And again, maybe, obviously, if there's concerns about making this

mandatory, let's hear those now. Let's discuss them. But maybe the quick focus can be on, should there be a set window?

And again, the way I saw this was, it's within that same five day window that the registrar has to provide the TACK. So I don't think we're adding anything to the timeline. I guess, the transfer timeline, but it is a process within the process. But I think that how much time should be given? And is that a set number? Is that flexible by registrar? Is it optional by registrar? I think those are the last couple of things we need to iron out.

So again, probably the big thing is, if anybody is really concerned about a mandatory notice at transfer request, let's discuss that quickly or first. And then let's move into thoughts on how long that should be, or again, the parameters around that timeline. But I'll open it up to the floor. Again, I think Emily has a suggestion from Rich that I reworded and put into highlighted here. So thoughts, concerns, comments from anyone? Jothan, please go ahead.

JOTHAN FRAKES: Hello. Yes, thank you. So in what form would this notification be? Like, would it essentially if it were an email, it might almost fulfill what we see in the NACK notice currently. If the indication here or the intent here was that this might be something simply within the registrar's logged in portal that some a notification pops up on the screen or is displayed in their account notice, that would be very different and might not necessarily stretch to fit some of that.

I think, the NACK notice or the NACK opportunity that that I think some of the friction is currently about the change in how this

behaves. So if this were an email notice or if it was explicitly in some form of an email notice, then that might stretch to fit an almost NACK-like behavior. And this is a great suggestion in that case. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. And thanks for that clarifying comment because that's a very good point. And my thought on that when we were discussing it was yes, it's something beyond the registrar's portal or where they're making that request at. It's something outside of that. And I think we've got wording somewhere in one of our recommendations that talks about that. I don't want to say, and again, we've tried to avoid this in all of our recommendations, saying it has to be an email.

If the registrant and the registrar have communication through I don't know, Facebook or whatever it is, it's one of those where that communication path maybe more secure if the registrar and registrant have that more secure than email, or again, maybe it is email. But to your point, Jothan, I think that it has to be separate from the mechanism where they're requesting it so that there is that, I guess, multifactor concept there. Excellent. So I'm talking and I'm not watching hands. So, Rich, please go ahead. I cannot hear you, Rich, if you're talking. There you go.

RICHARD BROWN: There we go. I was having troubles with the mute button. Rich Brown for the record. I just want to clarify some things from last week, not really changing anything, just a reiteration. But, really,

there is no mark process in what we're putting together. Because once the TACK is submitted, the transfer is done. Okay. So there really is no NACK process, which is why we're frontloading everything, which is why now the proposal is to make, when you request a TACK you get a notice. It can be email or text message, whatever, that says and it goes to the registrants stating we received a request for your TACK, and if this is valid click the link here.

This is like the Act NACK email once again. We're front loading everything. If you didn't request it, you click the no, I didn't request it. And that link nullifies the TACK and you move on. Hopefully, you follow-up with your registrar or reseller or whatnot to see why that notice was coming out. But that gives the agency back to the registrant to "feel like they are managing their domain and when and where it's transferred and what have you."

And just to reiterate, I know it's in there, but if no response is received to that email after the five-day period that the TACK is released automatically. And that's just a failsafe in case there's an old email on file or things like that. Although there shouldn't be. But that's all I got to say. Just reiterating from last week. That's all.

ROGER CARNEY: Great. Thanks, Rich. I'll just add on to that. Again, there was in our current recommendations, there's no explicit window for it. But our TACK notice when the TACK was provisioned did include language that the registrar must provide to how to stop or deny this transfer if it's not valid. So, yes, if a TACK is given, it can

transfer right away or except for x days depending on how the registrant responds to that.

But, again, our TACK provision notice had in it language where it would include how to stop this transfer. I don't remember the exact language. So it's not that the current one doesn't have the ability to NACK, it's just that window is from provision to whenever the TACK is used, which may be very small, or it could actually go for weeks.

So, again, I just wanted to be clear that you can, in our recommendations NACK something theoretically, but there was no explicit call out. And I think that was the issue with all the comments. Rich, I think that's an old hand. So I'll jump to Jothan. Please go ahead.

JOTHAN FRAKES: Yeah. And it's a new hand. And I'll go quick so that my esteemed colleague, Jim Galvin, can come next. So when Dan mentioned the term frontloading, I immediately upon my sip of coffee leveled up in my thinking here. Now because we're frontloading a lot of things, are we also frontloading the opportunity for those, I'll call them hotel California registrars that attempt to let you check out, but never leave. Are we adding more days and more hurdles to people who want to maybe check out of that hotel?

I like that we've got the ability to put some agency back into the hands of the registrant, but I think, are we still getting them that code so that they at least have the agency to do what they're going to do? So I guess my less polluted way of saying that or

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more clear way of saying that is, getting the TACK in the hands of the registrant or the registered name holder might be super important just so that they can be ready to go wherever they're going to go. Are we adding that agency at the cost of the agility there in a way that enables the hotel California-like behavior of some registrars? Thank you.

ROGER CARNEY:

Thanks, Jothan. And as Rich was trying to describe there into your point I think is, the idea that they could acknowledge it as well. So it could be that yes, okay, they get a notice and they click on yes, I did. And I want my TACK then that task can complete after that to provide the TACK. Now I'm not saying that if a registrar sends the transfer request notice that says, okay, acknowledge or deny or and someone acknowledges.

The registrar still has five minus however long it took them to reply to provide the text, or the registrar still has potential due diligence they can do or if it all as it was waiting for the registrant, then they could provision at that time. And again I think that's how Rich was trying to describe the acknowledgment as well in the notice. So I think that the notice has two parts to it, an acceptance or a denial there. Jim, please go ahead.

JAMES GALVIN:

Thanks, Jim Galvin for the record, Registries Stakeholder Group. Well, I want to make a comment speaking personally about all this. It take us a step back to first principles. In all honesty this strikes me as a registrar problem or registrar concern. So I don't

really have any vested position in any of this. But taking all of this back a bit here.

On the one hand, from a technical point of view, I'm trying to understand what problem we're solving here, okay, from a technical point of view. I believe I understood here that there's concern about the, "losing FOA," going away. And so there's a technical concern about being able to, they're inventing a technical concern that I have to be able to deny the transfer before it starts. Right?

And my question is, what problem are we trying to solve from a straight up system point of view? I get that an individual registrar may think that this is a problem for their registrants. And to that extent, they might want to put these little steps in the way where they're not going to just issue the TACK and have it go out the door. But from a system point of view, I really just from a first principle point of view, I don't see the problem being solved here. Okay?

And I want to remind us that last week, we agreed that there was going to be a small set of us who are going to be getting together in two weeks during the CPS meeting. And we're going to have some discussion. We're going to try to write some words to expand on the rationale for why the system that has already been proposed is sufficient to meet all of the requirements that we seem to have.

So the losing FOA, in fact, is not going away. It is simply being replaced by a much more streamlined, efficient process overall. And we'll put some words to that effect together so they can be

included in the document as a rationale. So that brings me to my second point. This really does feel like it's a user interface issue. There's no technical problem being solved here. Okay?

Because going back to first principles, it's just hard to believe that you can't impress on people the idea that if you lose control of your account then all bets are off. Now, what we're suggesting here is you're creating a system, you're complicating a system based on the implicit assumption that whoever the account holder is, is different than the registered name holder and is different than the person getting the notification.

I mean, I don't know. You registrars get to answer that question. Is that really true? Are you always dealing with two identities there? Because if you're not dealing with two identities there, again, I just don't see what problem we're solving here. I've logged in and asked for the TACK. That's my notification. I mean, you can put up all kinds of pop ups that you want along the way here.

So I'm just trying to understand again what problem we're solving and reminding us about the group of us that will write some additional words to help rationalize what's been proposed so that people understand that losing FOA is not really going away. It's being replaced by something, and we'll try to explain all that.

By the way, part of the replacement just to be very clear and open, part of the replacement is the clawback procedures that will come later. The fact is you've got a 30 day window to pull things back ultimately. And that's all part of this too. Anyway, thanks. Sorry to be a little long, bye.

ROGER CARNEY: Thanks, Jim. Just a couple of things on that. And I think you touched on a little bit of it at least a potential piece of it there in that the registrant may not be the person making the request for the transfer. It may be someone that has access to their account or for however reason, maybe it's legitimate, maybe it's not. But someone that has access to at least make the transfer request.

And the problem we're solving is, I don't think a technical problem, I don't think there's a technical issue here. It's a more of a security issue so that the registrant is agreeing to those that the transfer is occurring [00:20:19 –inaudible] them through an acknowledgment or just a lapse of that time.

But I think that Jimmy touched on it, and again, maybe it's legitimate, maybe it's not legitimate, someone has access to make the transfer request that is different than the registrant. So I think that that's the point of the losing FOA is giving that registrant that ability to at least confirm that the transfer is legitimate.

And maybe that's all they do is they go to their web professional who's hosting their domain forum or whatever and says why we're do it and they agree and it goes ahead, that's fine. But again, it's giving the registrant the ability and the ownership there to do that. And Jim, you're right. Most of the time, I mean, the registrant is the person logging in. But a good chunk of time it's not, and that's what we're trying to solve there.

And second point is, on the small team, and I think Emily sent out an email. I can't remember if it was this week or last week, but

she sent out some goals or some highlights for that team. And really, what was focused on, and I'm glad that's why Jim joined was some of the threat vectors that we see and we're trying to solve those, acknowledge that we're trying to solve them and here's how we're trying to solve them.

Or we're going to see some threat vectors that we're not trying to solve. It's not the goal of this group and we want to record that, okay, yes we know that's a threat vector, but we're not trying to solve it. And maybe we can point that somewhere else or maybe we don't even know. We're just going to admit we're not trying to solve it.

So we're going to move past it. And I think that's the purpose of that small team is to identify those threat vectors and how that's being handled. Okay, I will go with Rick. Please go ahead.

RICHARD WILHELM: Thanks, Roger. Rick Wilhelm, Registries for the record. I made a comment in the chat that the provisioning of the TACK does not initiate the transfer. And I just want to amplify this, that the provisioning of TACK is in the current way that transfers work the logical equivalent of doing a domain info to get that, to get the auth-info code.

And so the notion that there would be either a notification, and a confirm or cancel. Now I'd say this thing, there are two different things. Confirm cancel notification versus confirm cancel are two different things. Right now, it's a little bit ambiguous what it means. It says notification in the first sentence there in what's

highlighted, but then it says accept or reject, which is not a notification. It's like a proceed cancel a mechanism.

But doing that on the provisioning of the TACK is actually increasing the difficulty of transfer beyond what is there currently. And so I think we should be careful about that because I think even if we would do this, it's not going to solve the issue that people have raised in the comments where the comments are expressing is they want a chance to reject it right before the proposed transfer has gone through. This proposal that we have highlighted on the screen does not do that. It attempts to stop the initiation of a transfer, but it doesn't stop a proposed transfer that's about to go through. So this won't really satisfy many of the commenters.

Setting aside whether or not it does anything for security or user interface or any legitimate concern, it's not going to satisfy the commenters. So it's going to just add process but not really address the commenters. I think the restoration of the losing FOA, which is the last gasp of the registrant before the transfer actually goes through is the only thing that's going to satisfy the concerns raised by the commenters. Thank you.

ROGER CARNEY: Great. Thanks, Rick. Yeah. And I guess, the timing of that notice I'm not sure. Maybe the comments mentioned it, but in our current recommendations, once a TACK is provisioned and communicated, the transfer can happen fairly instantaneously at that point. And moving this concept of allowing a denial in front of the provision because it's not at provision, it's before provision. So

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it's before the provision, which means that's before that a transfer can happen.

And as you mentioned, Rick, and I mentioned earlier, it may be a minute after the TACK is provisioned or maybe 13 days later. But the idea of giving the registrant notice and an ability to stop it is what I believe the commenters are concerned about. When that happens, again, maybe they said that in there, and maybe that's because that's when it happens today. To me, when it happens isn't the concern. It's giving them that ability to do that.

And I think that, again, when you're looking at it, when a TACK is created, and provisioned, the transfer can occur. It doesn't mean it is occurring or will ever occur. It may not ever occur. But if we put this ability to deny it before the TACK provision, it actually stops the process before it even starts.

So I don't know. It's a good point, Rick. If the commenters wanted it as the last grasp, then that's something different than what I was thinking. So it's a good point to bring up. I just again, I don't think the timing matters. It's more of the functionality that matters giving the registrant that ability. Volker please go ahead.

VOLKER GREIMANN: Sorry. It was a hand that has already been taken care of. Thank you.

ROGER CARNEY: Okay. Thanks, Volker. Jody, please go ahead.

JODY KOLKER: Thanks, Roger. This is Jody for the record. So one of the things that I wanted to point out is that if we're requiring the actual registrant to actually accept or reject the release of the TACK before we give them the TACK, then that is actually adding process in for the registrants where they can't come to a website and immediately get that TACK. They're going to have to wait for the email and then hit the Accept or Reject button.

And I just wanted to see that's what we're talking about here. We can't release that TACK to them until they accept it or until the five days passes. It's a question for the group, I guess. And maybe for how this is written, but that was one of the questions I had. And then I agree with Rick that I don't know if any of these commenters will be happy with any of this without bringing back that loosing FOA. They seem to be dead set that they have to have that. It seems like a no win situation. I'm just bringing that up. Thanks. Bye.

ROGER CARNEY: Thanks, Jody. Yeah. And you're right. I think that this is a process in between a request and a TACK provision that we're talking about. And to me, I don't know that I see a difference except for what Rick mentioned, the timing. That this is the losing FOA. It is coming back. It specifically requires the registrar to do something and wait to allow the transfer to go through. So to me, we are bringing back the FOA. We're just bringing it back in the same window that the registrars have.

And again, I don't know is the FOA five days or three days. Maybe it's variable. I don't know. But in today's world, there's two five-day windows, one at the beginning and end, and we collapse that to one. And again, when we did that, I thought registrars would probably do, some of the registrars are saying, do a losing FOA anyway, similar. I notice with an acknowledgment or denial in that window.

So originally, I thought that we're talking about or allowing, but now I think we're saying it has to be explicitly done. And I think that that's what the commenters we're getting at is there needs to be an explicit window for the registrant to be able to deny it. And again the acceptance is more of a convenience of anything, but I was more of a security factor. But just my thoughts on that. So, Rich, please go ahead.

RICHARD BROWN: Yeah, Rich Brown for the record. Just to address some things. Yes, this is obviously a compromise on what we wrote previously. Yes, we are adding one more step, which will probably add 30 seconds to a minute to those registrants who want their EPP key immediately. This will also address those who are demanding their FOA, losing FOA back. We can't please everybody all the time, but this covers a lot of things.

And you're right, it's not a security or a technical change or fix of processes, it's simply and I've gotten attached the word agency, but it's really just giving the registrants what they want. And we're not going to please them all, but I think putting in a quick

notification. And when I say notification, that's the body that carries the approval or denial.

So you can have both in a notification. The registrar is simply saying, "Hey, we got this. Do you want to do it or not?" Most registrants would appreciate that, not all. We're not working against the small 5 or 10% in their demands. We're trying to work for a greater good. And with that, I'm done on this topic, and want to move on. But I think this small change is our compromise and our response, our proposed response to the feedback we got. Other than that, I don't have much else on this. Back to you.

ROGER CARNEY: Great. Thanks, Rich. Rick, please go ahead.

RICHARD WILHELM: And like Mr. Brown, I'm going to stop after this also. And this is not a registry thing because this is really a registrar situation. But I think that this is a worse situation than we are now because it still leaves open the complaints that we will be exposed, that the working group will be exposed to from those who say that we have removed the losing FOA and have therefore have this window of that a transfer cannot be rejected at the last minute. And even though I understand the logic that Jim Galvin has stated about the account being compromised, that logic will not hold up in the blogosphere, as it said.

And I think that this change actually causes all of the registrars to change all of their code and process with no real benefit and then also having to educate the users on how this works. I don't

understand why at this point we aren't just saying, look, let's just keep the losing FOA where it is and not complicate it and put a change into this process. And why not just put the losing FOA back and let it go?

I just do not understand why we aren't talking about that. Because that would rake aside a bushel or two of comments in one fell swoop. And it would also make there be a lot less change for all the registrar engineering teams that are out there. They're going to have to do the stuff that's on the screen. Thank you.

ROGER CARNEY: Thanks, Rick. And actually, we are talking about it. So you bring it up so we talk about it. And it's a very good point. And I think Jody can maybe touch on it briefly as well. Okay, does it make sense? And as Rick just mentioned, there's going to be work here from registrar's perspective and registrants learning it as well. So does it make sense that we're adding? And again, as Rich described it, I think he's right. I think we're adding the FOA into this five-day window. And to Rick's point, why not just leave it at the end of it, and it solves commenters, it keeps it consistent to today's work.

What's the benefit? The only benefit I can probably put on paper here is we're now potentially lengthening it the transfer process by creating two windows, one for the registrar and one for the registrant. And again, I think that that was the only reason we talked about why, she can't say that, is one of the reasons we talked about getting rid of the losing FOA was trying to make this a

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more efficient process. But I think to Rick's point, does it make sense?

And again, we're talking about the FOA here. Does it make sense to put the FOA upfront here? Or should we leave it at the last spot and when a gaining registrar submits a transfer request, the registry just puts it in pending and leaves it there for five days and it sends the notice to the losing register, like it is today.

So it said it's a very good question. I think it's a valid question to ask and try to be answered. So does it make sense to streamline it and to put it in the five day window upfront or does it make more sense to separate them? And then is there even a need to have a notice sent at request. So I think that's a valid point, Rick. I think Jody suggested that as well. So I think it's worthwhile discussing. So Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. And I think I just maybe wanted to follow-up a little bit on Rick's comment. Going back to the principles of the public comment review at the beginning of each of these documents. When we're going through these draft recommendations and we're going through the comments on those recommendations, the ultimate goal here for the work that this group is doing is to find a path that can achieve consensus support from the group. And not every group represented in this working group has weighed in on this issue.

So I think it's important that we hear as many voices as possible on this particular topic. But I think, ultimately, if we reach a point

in which it isn't clear that there's consensus to change from the existing policy, the sort of default path forward is to maintain what already exists. So in this case, that would be the existing losing FOA.

Keeping in mind that the working group has talked about small incremental changes being superior in certain ways to more significant changes. That's something to keep in mind whether that applies to this conversation. And it's also possible to revisit the fact that there are potential enhancements to the losing FOA that the group has very briefly touched on in the past.

So for example, making the losing follow-up period shorter than five days, making it so that a registrant has option to either opt in or opt out of the losing FOA, enhancements like adding the gaining registrar to the losing FOA itself so that the destination is there for the registrant to see. So those are tiny tweaks around the edges that for different reasons might have benefits. So that is a potential path for discussion for the working group if it appears that an alternative is not something that everyone is going to converge on or reach consensus on ultimately. Thanks.

ROGER CARNEY: Great. Thanks, Emily. Yeah, and good reminder there. Jothan, please go ahead.

JOTHAN FRAKES: I want to build on what Emily wisely pointed out is that if there isn't consensus, so we won't change anything. But I've mentioned this in the chat, and I think I'm probably a skipping record about this,

that one thing that we're pouring a tremendous amount of effort into this. We may lament the amount of time we spent on this until we have the whole picture on what rollback looks like.

Because I think that restores a lot of the agency potentially to the registered name holder and the ability of the registrar to help their customer. So I think we're working a little bit in the fog until we have more clarity on what rollback might look like in Phase 2 and how that plays into this.

So some of this effort and what we might solve here is likely to potentially be reset or disrupted by that rollback conversation. And I'm not sure what precedent there is to put a push pin in something from phase 1 and then later come back and address it. But I'm certain that whatever we come up with for rollback will have a transformative effect on whatever we've decided here.

I think we're working right now with an assumption of rollback being in the dark. And once it's eliminated or once we at least come to some consensus on what that is, I think we're going to come back to this conversation. And I feel the odds are very high that we're going to come back to this conversation. And perhaps, could we address this then because we're putting a lot of what I would call potentially disposable labor into something that we may lament later once we have more clarity on what rollback looks like in Phase 2. Thanks.

ROGER CARNEY: Great. Thanks, Jothan. And I appreciate, Jothan, trying to walk us through it and think about things holistically, but I know that he

also put in chat just exactly what Rick put in chat. It is always easier to stop it before it happens instead of trying to back it back out. The 30 day window, yes, it's great, and it will help us, a callback will help us definitely. But those are two reactive things versus something being a little more proactive on the front and trying to stop it. So I think the losing FOA is more of a proactive measure and stopping fraudulent transfers where the 30 day and clawback obviously is more reactive.

So I think and again, no matter how great the clawback is, there's still going to be work that people will do to get it back, but who should they wouldn't have had to have done. So I think Rick, and I'll blame a little bit on Jody too as well or credit Jody. I'm not sure which one. He'll take it. But, again, I think what Rich had said at the end of the call and what I put into words here was really bringing the losing FOA back. Now, yes, we have a notice here, but it's got the same functionality that the registrant can deny a transfer for a period of time, and can acknowledge it as well, and speed it along.

So I think that it comes down to the group. Yes, we are talking about bringing back the losing FOA in its functionality. But to Jody and Rick's point, does that need to move? Can it stay at the end? And again, as Emily points out, that's the way it is today. So if we don't get consensus, it's going to stay at the end anyway, and we'll still have two five day windows.

So I guess the question to the group is, is it advantageous to move the losing FOA out front to the five day window that the registrar has to provide the TACK and mention basically in parallel or at least sequentially within five days, or does it make sense just

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to leave it as it is today? The registrar has five days to provide the TACK or to date off info and put the losing FOA at the end of the process, at the last basically step or second to last, I should say. Registry actually doing it would be the last step.

So Again, I think we're talking about reinstating the losing FOA. We're not saying specifically losing FOA, but we're saying the functionality. And now the decision is, should it be upfront in parallel/sequence with the registrar work to provide the TACK, or should it just remain at the end of the cycle where it currently exists today. Thoughts on that? Rich, please go ahead.

RICHARD BROWN: I wanted to ask a quick clarifying question. What is the second five day window? In our new process, you request the TACK and the registrar has to provide it within the five days. Once you submit the TACK, there is no requirement for the registry to wait. Now in the current environment registries, there's a five day process but there's not a requirement in the new process. So I'm just wondering where this second five day window is coming from. And if I'm wrong in something, please illuminate me.

ROGER CARNEY: No, no, Rich. No, you're right on that. That's the discussion, what we've recommended.   In today's policy, there's two five day windows. And what we recommended--

RICHARD BROWN: I'm just mixing up how you ordered it there. That's right. I get it.

ROGER CARNEY: We're recommending one five day, but now we're bringing the losing FOA back in. So do we want to put it in the one five day or?

RICHARD BROWN: Well, that's my point on my original argument, is I don't want to add a second five day window when we've done all this work to reduce it to the one window. And we're not really changing much except turning the original notification where you "send the code" into a verification notification with the follow-up of the code. I'm just saying it's a very small change that I think we should consider because if we're not going to come to a consensus on it, the other options to me is like, well, we're going to defend ourselves on whatever the clawback we come up with, which as a group, we haven't started discussing anyway. But that's all I got. Thank you much.

ROGER CARNEY: Thanks, Rich. Keiron, please go ahead.

KEIRON TOBIN: Thank you. Yeah, I was wrapping my head around it. I think it is something that we can definitely look at. I think maybe changing its name from the losing FOA though in terms of if we are going to combine them two together just to simplify exactly what the process is and make it one together just so that we eradicate confusion which has clearly appeared in the group. Thank you.

ROGER CARNEY: Thanks, Keiron. So you're suggesting changing the name. Is that what you said?

KEIRON TOBIN: Yeah. So obviously, in terms of the policies that we've got the two, we put them together and make them a process that is understood by everyone if that's the route that we want to go down. Because when you were saying about the two five day, it's threw me back. I got where you was coming from and I was like, okay, maybe that needs to be wrapped in something nice in order to make it more presentable. Because I worry that if we presented it in a way that there was two five day windows. I think from an outside of view, it's going to be more confusing, and we need to ensure this continuity. Thank you.

ROGER CARNEY: Thanks, Kieron. Yeah, again, I think that that's the real discussion is, in today's world, registrars and registrants are used to two five-day windows. The registrar always gets five days to provide the auth-info, and the registrant gets five days to acknowledge or deny the transfer at the end.

And what we've got here in the text here highlighted is one five-day window that we're proposing to do both of those functionalities concurrently in sequence, however that real really works, but at in one five-day window. But if we don't get consensus on that, as Emily pointed out, we will be with this same as today. The

registrants will get five days to provide the TACK and registrants will get five days at the end to acknowledge or deny.

So if there's no consensus on putting this in the first five day window, we'll be at the spot of, okay, registrars get five days to provide a TACK, and registrants get five days at the end to acknowledge or deny. And Rich is clear. To me, Rich is clear that he sees a benefit of moving this into the first five-day window, streamlines it, and I understand that. But I think we're hearing different views, but I'll let Jody and Jothan and Rick and everyone else talk about that if they want.

And again, I think something that Rick brought up that's important is if we move it here registrars and registrants will have to do something different. And if we leave it status quo, both of them will probably still have to make some small change, at least the registrars will, but the registrants may not have any different learning curve on that.

Comments? Nothing more. Steiner in chat. Yeah, that's a good point. We can come up with that and show that fairly easily, I think, in a timelines. Oh, I think that would be good. But, again what we're basically talking about is we recommended versus what's happening today. And that's all we're really doing. Okay. Any other comments on that?

And again, I think that, obviously if it's decided that these are two separate windows, then the notification on request as we discussed last year wouldn't be required. Registrars could send it if they wanted to, but the policy wouldn't require registrars to send

a transfer request notification, which is what we recommend today anyways, our current recommendations.

Okay. So we'll work on that just get two quick timelines up, maybe before our next meeting so everybody can take a look at that so we can see them.

And the other thing to discuss, I think, as Emily pointed out, is when we were discussing the FOA is, does five days make sense? Can it be three days or can a registrant opt out of that somehow. And again, to me, that gets a little tricky. But at least the window seems obvious to be able to answer. It doesn't have to be five days. It can be less than five days. Is five days the right number? I think that that's something that we can talk about. And if and registrants can opt in or opt out, I think has come up multiple times. Emily, sorry, please go ahead.

EMILY BARABAS: Thanks, Roger. I was just going to point to on screen now there were indeed a couple of comments to the initial report that specifically spoke to proposals around making the losing FOA optional for the registrant to decide whether or not they wanted to receive it. So those are on screen now. And if you're following along in your own version of the document, that's at the bottom of page 5. Thanks.

ROGER CARNEY: Thanks, Emily. And I think that that was this first one under proposed edit. Again, that to me, it gets tricky as to how that choice is provided. I mean, if you're providing the choice at

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request time, the requester gets to choose for the registrant. So I don't know. That's interesting. Jody, please go ahead.

JODY KOLKER: Thanks, Roger. This is Jody again for the record. Yeah, this would be nice, but I think it's going to require just a number of changes between the registrant and registry, and that would include going through IETF to get this done. The registrants are somehow have to tell the registries that we need the act next step for the transfer or it's an instant transfer. I mean, I think the idea has some merit, but I think it has some drawbacks too. And I'm not sure how secure it's going to make it if we have somebody hack into your account, but I understand everybody knows that pretty much all bets are off then. Thanks.

ROGER CARNEY: Thanks, Jody. Yeah. And again, I mean, when I'm reading through it, I mean, if we had the ACK/NACK step in the first five day window, then the registry wouldn't care because they would always process a TACK. It's just the registrar wouldn't provide the TACK and an ACK/NACK one until it was after NACK. So it'd be more registrar work for sure. Okay. Yeah. And again, I think that all those what's on the proposal, was there any other edits proposed on that Emily? Oh, there's a C, and D?

EMILY BARABAS: Hi, Roger. So there was two additional proposed edits that were on different topics. So one recommendation that if a registrant has two factor authentication enabled at the registrar, that the

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losing FOA would be optional. So that's a bit linked to the previous one. And the last proposed edit was actually something quite a bit different.

This was the proposal from the leap of faith comment about enabling better visibility of the before and after WHOIS by having the gaining registrar ask for the consent of the prospective registrant to display the after WHOIS so that they would be able to see that make the comparison as part of their decision whether to move forward with the transfer.

ROGER CARNEY: Okay. Great. Thanks, Emily. So, yeah, I think when you're talking about B and C, to me, that's all up to the registrars. At least I wouldn't recommend trying to make this optional at the registry. I think the registry would stay with if they're providing a valid TACK, that's all they need or prior to the TACK, and they can they validate it either way. But is it worthwhile to look at these from a registrar perspective? To me, C leaked into B.

If a register says we have two factor, we don't have to send "the losing FOA" before we provide the TACK. But if they don't have two factor or multifactor, I should say, or B, again, going down here somehow if a registrant says, yeah, they don't need the ability to ACK/NACK, again, to me, that's all registrar base stuff. So I think I'll propose it to the registrars to look at B and C and see if that makes sense to add in.

And again, I don't know that either of these have to be policy things or I should say, global policy things, maybe these are

registrar policy things. But if we say no losing FOA has to be sent, then obviously, the global policy would have to reflect that. But, again, this is in the middle path to an FOA or no FOA.

And again, I think this only works, as Jody mentioned, if the functionality is put in the first five day, the only five-day window. Or I don't think either one of these work if we stay with the current scenario of a five day window to start in a five day window at the end. So otherwise, you'd have to make as Jody mentioned, so much changes that would not take effect for a long time. But anyone with comments on those?

And again, I think registrars take a look at these. Is it something that's worth reviewing, and does this add, I don't know, credence to staying with the one five-day window? And again, I think that's the big thing for us to decide is, are we going to leave one five-day window as Rich has mentioned, it seems smart to him, or are we going to go back to two five-day windows one for the TACK and one for acknowledging or denying the transfer.

So think that on that decision that besides these comments as well is I don't think you can do B or C based on if you had two windows. I think you could only do those on one window. I mean, obviously, you can do it on two windows. It would just take an enormous amount of work. But realistically, I don't think B and C can happen unless it's agreed to move the losing FOA functionality upfront. Thoughts? I will ask the registrars next week if they don't have comments now, give them some time to think about it. Okay. Jothan, please go ahead.

JOTHAN FRAKES: Roger, we happen to have the CPH TechOps meeting tomorrow at, I think 8 o'clock Pacific, 11 AM Eastern. It might be worth. We were going to agenda bash for the CP Summit, but perhaps some of this might be a good conversation for the CPH TechOps to grind on a little bit. So I'll talk with my co-chair here and see if we can perhaps add that on to the agenda. Thank you.

ROGER CARNEY: Great. Thanks, Jothan. Yeah. And again from the registrants and anyone else if they have thoughts on this. I'm not saying this is just a registrar decision, but thoughts on this. And to me, everyone needs to think about, does it make sense to change the process today as Rick had mentioned and move the losing functionality upfront, which will require registrars and registrants to learn something new or if we're keeping the functionality, should it just stay at the end?

And again, as Rich pointed out and as I pointed out, the big factor there is it's you're losing the streamline, you're losing that efficiency. But that doesn't mean it's not a bad idea. It's just that that's the one thing that comes up.

Okay. Again, let's think about it, and I'm going to ask next week on it. But let's talk about the window. Should this functionality, what kind of window? Thanks Volker. And I think that's what Rick was trying to get to as well. It's not worth the effort of moving. But, again, I want everybody to think about it and we'll talk about it and get clear set on that. So is the five day window correct? Should it be shortened to, I think, somebody suggested three days. Thoughts? Concerns? Jothan, please go ahead.

JOTHAN FRAKES: Well, as one of the old timers, I guess, in this, the five days came really originated around accommodating business days and calendar days where you'd have a three-day weekend or some other type of a holiday and provide somebody an appropriate amount of time to react, to respond. And so if we tighten it to three, do we lose some of what we gained from that original thinking? And is that original thinking something that was important now, as important as it was that. Thanks.

ROGER CARNEY: Great. Thanks, Jothan. And thanks for that. I mean, it makes sense as to the timeline that was picked. And to Keiron's point in chat, it is up to five days, but it's a registrant decision of up to five days. If there's no response is done, the registrar is waiting for five days no matter what. So I mean, theoretically, if a registrant really wants to transfer it even in today's world, once they get the auth code, it can go fairly immediate.

Okay. Any other comments? It sounds like five days is the winner? Jothan provided some good history there some logical thinking from even then. So I think that if no one is clamoring for less days, and as Keiron points out, it's up to five days. And it still provides the registrant that window. Well, Raoul, it's a good point. If we change it, who's winning here. And really, I don't think anyone is if we change it.

As Keiron pointed out, it's up to five days. So if a registrar really wants to move this along, they're going to get the losing FOA

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today and click accept, and it's going to go within minutes of when they accepted it. So changing it to three days, I don't know that matters all that much. At least from my perspective, maybe someone else has ideas on why that shortened time period would help or hurt the process. Jothan, please go ahead.

JOTHAN FRAKES: Yeah. So I answered this because Raoul had asked wisely, who loses if the status quo stays here. I think with technology, we're always looking to reduce friction and improve throughput. And in this case, I think the folks who have been looking for ways to move this in a more agile way are just looking for better ways to serve their customer needs. So it's just what do we lose in the process? I think that's what's the crux here. Thanks.

ROGER CARNEY: Thanks, Jothan. Yeah, that's a very good point because I mean, before I was in this industry, I had worked with registrants quite a bit, and I was always asked -this was back a few years ago- but asking why the process takes so long. And as Jothan points out, you should always look to improve things. But to Raoul's point, is it really improving anything? It's hard to say.

But, yeah, it's making it more efficient for sure because I got those questions even before I started working here. And when I started working in this industry, it was like, okay. Yeah. Why? Obviously, there's reasons why. That it makes sense. But it's still not easy to explain why the companies that are basically running the Internet are so slow at doing a transfer.

And it's like, okay. Obviously, you can defend that because it's not that they're slowing it down, it's just the process in place for the registrants themselves. But I agree with Raoul. I'm not sure there is really [01:07:11 - inaudible] I think it last time. So I think that unless someone could come up with an idea, the five day seems like it's more than adaptable for the group. But if someone has something, it'd be great.

Okay. We've got about 20 minutes to go, I think. I'll get to Emily here real quick. I think that our next couple recommendations are dependent on the losing FOA concepts because most of the comments refer back. But Emily, please go ahead.

EMILY BARABAS: Thanks, Roger. Emily, from staff. So in the time we have remaining, if it's helpful, I can maybe go over what recommendations 3 and 4 say. And rather than going into all the specifics of the comments right now, because I think that they're really about tweaking those recommendations at the edges. Maybe it's useful to pose the question about if we stick with the losing FOA, it sounds like the notifications in three and four would go away completely.

But maybe that's worth just having the conversation so that everyone's on the same page that the decision that the group is making is between a set of what I believe is now three notifications versus the losing FOA in which all of those recommendations should go away. So would it be helpful for me to just remind everyone what recommendations 3 and 4 are?

ROGER CARNEY: That'd be great. Thanks, Emily.

EMILY BARABAS: Sure. So let me actually just drop this link in chat so everyone can follow along.   And we're just at the very top of the recommendations reworking document.   So this is the recommendation that's saying that, if you recall, the original set of recommendations is that the losing FOA goes away completely. There is no notification of TACK request or it's at the discretion of register if they wanted to, but it was not included in the recommendations.

And then the first notification that would be received by the RNH is a notification of TACK provision, would include the domain name, the date and time that the TACK was provided, and information about when the TACK will expire, instructions about action that the RNH can take if it's invalid, if the request is invalid, and would also include the TACK, if not provided by another method of communication.

And I'll actually mention there are a few comments that were directed towards recommendation 3 that are really more broadly, I think about this question, about the Losing FOA. So maybe I'll just touch on those so that we can roll them into the discussion as well.

There were a couple of comments that sort of reiterate some of these concerns discussed under recommendation 2 regarding elimination of the losing FOA that potentially a transfer may be

affected by the time the RNH receives this notification, the notification of a TACK provision and is able to act on it depending on the sequence of events. And in this particular case, the recommendation was to perhaps have a smaller delay or something like that, but to still retain that opportunity. So I think that's consistent with what's been discussed here.

There was a concern raise that maybe, and this is actually also consistent with the recent conversations, that perhaps having a notification of TACK requests as opposed to provision or in addition to provision could be a path forward? And then a more specific comment that's about the nature of the notice. So I don't think we'll go into that just yet.

And then one additional comment, reviewing this idea that registrants have a genuine opportunity, a period of time, in which to review a transfer request before the TACK is being issued. So I think those are all consistent with what we've already been discussing, but I did want to flag them on this additional document if people want to revisit those.

And then I'm just going to go over to recommendation 4 and remind everyone what that additional recommendation was about. So here's the link. Recommendation 4 was about the notification of transfer completion. So this is once the transfer has been completed, that an email is sent to the RNH with the domain names, text stating that the domain was or domains were transferred, the date and time of the transfer, and instructions detailing what to do if the transfer was invalid.

So in this case it would be how to initiate a transfer reversal. So potentially in the last bit of time in this call, maybe it's worth just getting on the same page about, is there agreement that the choice here is between these three notifications in combination versus the losing FOA, or is there another combination that's potentially on the table at this point. Thanks.

ROGER CARNEY: Thanks, Emily. Okay. Yeah, and I think, obviously, these two recommendations are tied to the outcome of our decision on where the losing FOA functionality gets placed, if that gets placed in the first five day window or if it stays to where the current today's process is at the end of it. I think that that's going to dictate what kind of weight did these have.

And as Emily pointed out in the comments, especially on recommendation 3, point more to the problem of just not having a losing FOA. I think that, obviously, today or our recommendation is notification here in 3 and 4, do they make sense no matter what we do with the functionality. It's interesting because I guess I never thought about it from that perspective. I mean, obviously, to me, recommendation 3, no matter where you have, a losing FOA functionality, you need to notify the TACK. So once it's provisioned, you notify.

So I don't think, and maybe someone can correct me if I'm not thinking down that path, that there's any reasons to change 3 because a notification should be sent once the TACK is provisioned. And to me, the data elements still are valid and including the last one about the second to last one, the bullet

down here, instructions detailing how the RNH can take action if it's invalid. To me, even if you move the functionality in the first or the registrar window at the beginning, to me, there's still no reason not to include instructions how to do it, invalidate it.

Again, once the TACK has provisioned it, the transfer can happen. It's not saying it's going to happen right away. So there's still a window beyond provision to actually execution. But even then, you definitely moved or kept the last five day, the second five-day window, which is not in our recommendations, but what happens today, if we kept the losing functionality in the five-day window at the end, to me, still this data seems to make sense and instructions on how to stop, it still makes sense. And maybe that's a little different depending on that. I don't know.

But, obviously, to me, it still makes sense to have this one. So I open it up to the floor and see. To me, I think, obviously, this still has to happen just because once it's provisioned, you have to at least notify somebody here it is. So I think three is still valid. And I think that the data and three still makes sense. But I'll open up the floor. Any comments questions on three. We've got about 12 minutes. Emily, can we pop up the comments on this too. I suppose really the comments specific not to the losing.

EMILY BARABAS: Hi, Roger. Sure. If it's helpful, we can dive into some of the questions and at least talk through some of the issues that were we're raised about this notification if you think it's going to be retained potentially in addition to you whatever is recommended regarding the losing FOA and the notification of TACK requests.

ROGER CARNEY: I don't think there's any reason to lose recommendation 3. And obviously, the group could speak up tell me I'm wrong. But I think the recommendations 3 still stands. So I think it's useful if we can cover at least the comments. We don't have to dive into them real deep. We only have about 10 minutes. But at least cover them and get people thinking about them so that we can talk about them. So thanks, Emily.

EMILY BARABAS: Sure. So the first one is actually a pretty meaty one, and there are a number of comments on it, so this might be a good one to start with. So this is regarding privacy and proxy services. So there were a number of comments that are sort of along the same lines noting that the current language of the recommendation coming back up here doesn't really give a lot of space for cases where there's a privacy proxy service in place and the registrar is providing that privacy proxy service.

So in the case of the losing FOA now, at least as I understand it, if the registrar has access to the underlying customer information that the losing FOA would be sent to that customer as opposed to the provider, and that that's compliant with the -- thanks Jothan, that's compliant with the transfer policy as it is today.

But the way that the recommendation is written, it's saying that the registrar of record must send the notification of TACK or provision to the RNH without providing a lot of additional detail. And it's

defining the RNH as listed in the registration data at the time of the TAC request.

So these comments are basically saying, hey, you need to make sure that the recommendation creates space for those cases where a privacy proxy service is being used to make sure that it's possible to send that notification directly to the underlying customer where appropriate and where that information is available to the registrar.

So what we've done here is just sort of suggested what an implementation note could look like if there was agreement that that should indeed be part of the recommendation. And this actually combines two different edits. So one is trying to incorporate that feedback.

The other is that we noticed that there were a number of comments that express confusion about this clause as listed in the registration data at the time of the TACK request. So people were seeing TACK request and looking at TACK provision and seeing that there was an inconsistency there and getting confused.

So what we're suggesting here is that you could actually take out that clause, put it in the implementation note along with text about the privacy proxy service, and say something like for the purposes of sending the notification, the registrar record should use contact information as it was in the registration data at the time of the TACK request, in cases where the customer uses a privacy proxy service, the registrar record should send the notification directly to contact information associated with the underlying customer where it's possible to do so.

A question that we had that we'd also like feedback on is whether this should refer to both privacy and proxy or just proxy because the proxy service is the RNH, but for a privacy service, it's the underlying customer that's the RNH, which seems okay in the existing language. So that's the first block. So I don't know if people already want to discuss that or Roger, if you prefer, I go over some more of these other sections of comments?

ROGER CARNEY: Yeah. Let's go over the other sections. I don't think we'll have time to get into them too deep. So let's just get them read out and then make sure everybody understands what we'll be trying to cover.

EMILY BARABAS: Thanks. So certainly, we'd appreciate people to giving a little bit more thought to comments around privacy proxy because it's obviously an issue that comes up elsewhere in ICANN policy work and has proven to be a little bit sticky. So we want to make sure that we got all of the necessary input to make sure it's clear and correct.

So ICANN org suggested a number of additional elements that could be added to the notification of TACK provision to make sure that the language is as clear as possible and enforceable. So for example, an element that explains that the TACK will enable the transfer of the domain name to another registrar. So that's a customer education element to make sure people understand what it is that the TACK does.

The deadline by which the RNH must take action if the request is invalid so that the registrar has enough time to NACK the transfer where applicable, noting that in certain cases, this may be received after the transfer has already gone through, and any required actions registrars need to take, and the deadline for doing so upon giving notification by the RNH of an invalid request. So this is about potentially adding a bit more detail to this notification and also increasing elements of enforceability there.

The next set of proposed edits also came from ICANN org. It was noted that the recommendation seems to indicate that the TACK can be provided by email. And this references RFC 9154, subsection 7, section 4.3, the registrar's interface for communicating the authorization information with the registrant must be over an authenticated and encrypted channel, whereas email doesn't necessarily meet that requirement.

So the suggestion here is that the text be edited to indicate that instead of the communication itself, including the TACK, that the communication includes a secure mechanism to provide the TACK. So that's potentially a substantial change that might need some more discussion.

There was a suggestion that the notification be sent in English in addition to the language of the registration agreement as English is the primary language used in the ICANN universe. There is an additional comment that I believe is pointing to this ambiguity in the language with that provision about the timing in which the notification is sent.

So I think that the correction above, and I do encourage everyone to make sure that this is the case, but I believe that this suggested redline above with moving the language about the timing of when the data is essentially taken, corrects any confusion that was caused by this comment down here from the registries, but please do double check me on that.

There is a comment that there should only be one notification in the case that 25 domains are transferred. It's not completely clear from the language of the comment which notification this would apply to. The group did allow for some consolidation of notifications in the final notice, the transfer completion, whereas with the notification of TACK provision, that was not something that there was a consolidation envisioned on. There was some discussion of potentially bulk transfers and multiple TACKS being processed, but there were no recommendations ultimately put forward on that.

And then finally, there was a suggestion that security best practices should be included in the transfer policy itself so that they become requirements on registrars. And I think the question for the group here is potentially whether that's in scope for this group as the group has previously discussed that things like account security are outside of the picket fence.

But that could also potentially be something that could be clarified by the comment or if there's something in the comment that they're thinking about that's potentially within the picket fence. So I think that that's actually it for three, and we're almost at time. So, Roger, I'll pass it back to you. If you want to clarify any of this or just want to wrap up for the day. Thanks.

ROGER CARNEY: Great. Thanks, Emily. It's great. And again some of the first few comments here, obviously, are about losing functionality. So once we solve that and, hopefully, we can get good answer next week. Again the options we're looking at is moving that functionality into that one five day window that the registrars have to provision.

Obviously, they can't provision it until after that window. Or the other option we're looking at is keeping that functionality, but keeping it at the end where it is to today's policy between the gaining registrar and the registry actually. I guess it's the registry notifying the losing and the registry actually taking action on that window there.

So those are our two options. It sounds like we're all good with the five days, and it makes sense to leave it there. But really, does it help to put it at the beginning to streamline it? Or is it just better not to change the process for that potential efficiency. So I think that's what the decision really is looking at, is that kind of thing. The efficiency reason or leave it at the end for the convenience or the amount of work that has to be done both by registrars and learning by registrants.

Does that override the efficiencies that are gained by moving it? Once we get that, I think that answers these, but then obviously, these other few comments, do we need to call out privacy proxy issues when we're talking about it here. Does it make sense to add some more details as some of these comments provide. So I think that we can think about those and we'll bring this back up.

Next week, we'll start with that losing discussion, and hopefully we can get that resolved and move past that. And again, I think we've moved past the discussion of the functionality existing or not. I think everybody says it needs to exist. We just need to decide where is it best, efficiency at the beginning, or consistency at the end overrides the efficiency piece. But think about that, and we'll bring that up first thing next week, and then we'll get on these privacy proxy and other comments here on recommendation 3. And, hopefully, we can move through those fairly quick.

And as a final note, again, we're going to add a second meeting each week starting the second week in November. I think the first meeting is November 10th. So we'll do an 8 and 10 and then and go twice a week from there on through the end of the year and see where we ended up. So I think we'll close the call now. It is 12:30 for me. I have passed for everyone, and we will pick this up next week. Thanks, everyone. Good discussion today.

[END OF TRANSCRIPTION]