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## ICANN Transcription

### Transfer Policy Review PDP WG

**Tuesday, 14 November 2023 at 16:00 UTC**

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JULIE BISLAND:

Good morning, good afternoon and good evening. Welcome to the Transfer Policy Review PDP Working Group call, taking place on Tuesday, the 14th of November, 2023. For today's call, we have apologies from Prudence Malinki, (RrSG). She formally assigned Heidi Revels, (RrSG), as her alternate 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. 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. All members and alternates will be promoted to panelists. Observers will remain as an attendee and will have access to view chat only. Please remember to state your name before speaking for the transcription. And as a reminder, those who take part in the ICANN multi-stakeholder process are to comply with the expected

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standards of behavior. Thank you. And over to our chair, Roger Carney. Please begin, Roger.

ROGER CARNEY:

Great. Thanks, Julie. Welcome, everyone. Just a couple things before we jump into our agenda. Just a reminder that we're not meeting next week, so our next meeting will be, I believe, on the 28th of November. And the only other thing I had to mention was we are on basically our last big topic here of change of registrant. And our goal is to get through the change of registrant and be in a good spot by the next ICANN meeting in March, ICANN 79. So the goal is to have our our major discussions wrapped up by then and moved on to our preliminary recommendations for change of registrant. So just trying to set pace here for us. We've got just two months or so before that happens with a few holidays in there. So I think it's doable. I think we've already covered some of this area. And I think that we'll make good progress from then as well. So just wanted to lay that out for everybody.

And lastly, I'll just open it up as we do every week to any of the stakeholder groups that have any comments or questions or discussions they want to bring forward that's been occurring offline that they want to bring forward to the group to either be addressed or at least made aware of. So I'll open it up to any stakeholder groups. Steinar, please go ahead.

STEINAR GROTTOROD:

Yeah. Hi, this is Steinar for the record. I somehow kind of touched this into the last meeting in the Consolidated Policy Working

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Group and asked the policy working group to try to imagine a scenario where this change of registrant is not a part of the inter-transfer policy. Because I've spoken to some registrars at the latest ICANN meeting. To my understanding and the history here, and I guess Theo can take more into details, is that it was not necessarily the best scenario that we ended up in this change of registrant policy into the inter-registrar transfer. So I'm just kind of announcing that we will have a more deeper discussion into the Consolidated Policy Working Group in At-Large for whether we believe this is a good idea or a bad idea. So thank you.

ROGER CARNEY:

Great. Thanks, Steinar. And I think that's something that I appreciate you guys discussing already. You know, we haven't got down on that path that far. But yeah, I think that's important to recognize is that I think no matter how we end up coming out of this, there will be some change of registrant stuff in the policy still. It sounds like that we're heading toward maybe less restrictive or more less defined change of registrant in the policy. But again, over the next month or so, we'll figure that out and get onto that. But I appreciate the group looking at that already. So great. Anyone else? Okay. Good.

I think we'll just go ahead and jump into our agenda items then today and kind of start out with just a review of the change of registrant and the charter questions dealing with those. So I think I will turn this over to Christian to have him walk us through these. Please go ahead, Christian.

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CHRISTIAN WHEELER: Thank you, Roger. So yeah, so we're going to dive right back into change of registrant, which you may recall we talked about -- I wasn't there, but you guys were there last year, June through August of 2022. So it's been a while. So we're just going to give a kind of quick refresher on the change of registrant policy real quick and then start kind of reviewing some of the questions that were in the charter relating to the overall policy. We'll start with that kind of high level and then work our way toward discussing the definitions. Kind of just bear that in mind.

So first of all, what is a change of registrant? Let's just go right into that. So the change of registrant, as you probably all know, is just to make sure that the changes to the registrant's contact information have been authorized and providing procedures for how to do that requirements and also making sure that when it is in conjunction with a registrar transfer, providing some security requirements to help prevent any unauthorized transfers that might occur. So a change of registrant really entails a change to the registrant's name, organization, or email address or the administrative contact email address if there is no prior registrant email address. I don't believe that's the case very often, but that was what the [IRT EC] group recommended when the change of registrant policy was first enacted.

And a material change, we'll go into that a little bit in detail, it's really just a non-typographical change. That's not just a simple mixing of words. It seems like something that is actual substantive change, which is still up to the registrar to determine what that looks like.

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And as part of that security protocol for when there is possibly an unauthorized transfer, really it is to put in a 60-day inter-registrar transfer lock after there's a change to that registrant name, organization, or email address. However, the registrar does have the option to provide an opt-out opportunity for the registrant if they opt out of the 60-day lock prior to updating their contact details, then they wouldn't be using that lock. However, the registrar doesn't have to provide the opt-out option. It can just, and in that case, once a registrant changes their name or changes that information, then the lock would be put in place and the registrant would be unable to transfer the domain name for 60 days, transfer to another registrar. And that is all detailed further in the transfer policy section two, section one being inter-registrar transfers and section two being inter-registrant transfers.

Now, in the charter, there were three questions that were pertaining to the overall policy itself. So those are the ones we'll kind of look at first. And these should look familiar. There was a lot of discussion around these, so I'm not going to go into all the detail about them, but just kind of want to act as a refresher.

The first charter question states that according to the transfer policy review scoping team report, the change of registrant policy does not achieve the stated goals and is not relevant in the current and future domain ownership system. To what extent is this the case and why? Are the stated goals still valid? And if the change of registrant policy is not meeting the stated goals and those goals are still valid, how should the goals be achieved?

So previously, the working group had discussed several possible goals, including for standardization, making it easier for an easier

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experience for registrants. Also improving the security by ensuring that the changes are authorized and possibly catching cases of domain hijacking through the 60-day period where it's locked. They obviously have the opportunity to catch that. And then also the group noted that consistent with transfer policy B1, that the registrants must be able to update their information and transfer to the registration rights to registrants freely. So those were some goals that the group noted were important and probably still valid.

However, the group did note that it didn't in reality seem to prevent instances of hijacking. While it was still a valid goal for the group to have, for the transfer policy to have, it didn't really quite realize that. And that was kind of further evidenced by metrics provided by the Global Support Center, ICANN staff. Theo, I believe last time asked for that, so I can drop that into the chat where that information and where you can find that. So, but basically that was the group had seemed to say that there were still some valid reasons for making it standard for registrants and making sure that there are some kind of security things involved. But ultimately, especially by the fact that the transfer lock is optional, particularly in cases where the registrar lists themselves as the designated agent, it kind of defeats the purpose and doesn't really provide that added security. So, the transfer policy might be worth some change. So, I'll just kind of stop right there. If anyone has any comments or questions, I'll turn that over to you, Roger.

ROGER CARNEY:

Great, thanks Christian. Yeah, and again, I think Christian covered this pretty well. It's taking a look at the fit for purpose here and recognizing the two big pieces here that kind of make this a little

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less maybe important than it may have been thought of at the time. You know, the opt out obviously being big, but also the designated agent. And I think that a lot of this policy around this change of registrant gets avoided just on those two basic concepts. So, I think that that's where this group last year got to, was, does it really do anything for that? And even in the instance of a hijacking, as Christian pointed out, typically that's occurring through an outside means, either someone getting a password and getting in, and then you really don't know what they're doing, or even as simple as getting someone's email and controlling that. And it's still being able to bypass this. So, I think, again, when we look at this, and as we discussed last year, the strong parts here disappear a bit. I think that we can still look at security issues, and notifications, and things like that, that make sense and that occur today, to continue down that line. But yeah, I think again, a couple of those big pieces kind of knock this out. Jothan, please go ahead.

JOTHAN FRAKES:

Yeah, thank you very much. So, the point I'd like to make with this is, this is great, I think it's a great summary, Chris. And the thing that comes into play here, when having discussions with registrants, where something changed with respect to the registrant, sometimes has an interplay with the EDDP and ERRP processes, where domains might flow into some sort of a redemption or redemption-esque unpaid status, and then be repurposed by the registrar for some means. I've seen this where what might seem like a hijack or report by a registrant might end up being something that's actually, where they just didn't pay their

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bill, and the registrar is flowing the domain name into their recovery process to recover the lost funds. So, I don't know if we want to partition that or identify that wording somehow, in order to have that, like a perimeter around those things being interplayed with this. Thank you.

ROGER CARNEY: Great, thanks, Jothan. Any other comments on this first charter question here? Okay, Steinar, please go ahead.

STEINAR GROTTEROD: I just want to ask Jothan here, I understand your scenario, but is this scenario depending that there is a change of registrant into this policy, or can it be handled by the registrar without being included in the inter-registrar policy? Thank you.

JOTHAN FRAKES: Yeah, so essentially here, there will often be what appears to be a change of registrant in that the effective control of the domain would move out from the registrant of record, or the registered name holder, but it's going to vary in how different registrars process the name when they go into this unpaid state, having to do with their own terms and conditions. But it does often appear as a change of registrant, and so it does have some interplay here, and would have interplay with the locks, for example. Thank you.



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ROGER CARNEY: Great, thanks, Jothan. Hopefully that answers your question. Theo, please go ahead.

THEO GEURTS: Yeah, thanks, and while I agree with Jothan that there is indeed an interaction there, but I do think it's a precursor to what we're going to decide on how we're going to move along with the entire change of registrant in general. I mean, if we end up in a spot where Jothan's example doesn't apply, then we don't need to take care of that, and I don't think we're there yet. So I think it's a good note, and we should park that somewhere, but for the moment we can just move on, I guess. Though looking at the questions, the question itself, do think that we spent some time on it, and to that extent, we can just move it along. Thanks.

ROGER CARNEY: Great, thanks, Theo. Yeah, and again, yeah, this is a fairly high-level look at this. We'll definitely get into experimenting with those scenarios and use cases as we delve into them, but yeah, definitely noted, and we'll bring that back up. Any other comments here? Okay, awesome. Let's go ahead and move on, Christian.

CHRISTIAN WHEELER: Roger. Yeah, so moving on to number two, and again, these are just kind of very high-level, but charter question number two said that data gathered in the transfer policy status report, which I just put into the chat, indicates that some registrants find change of registrant requirements burdensome and confusing. If the policy is retained, are there methods to make change of registrant

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requirements more simple and more manageable? And if the policy is retained, are there methods to make change of registrant policy simpler while still maintaining safeguards against unwanted transfers? So this was definitely something that you guys have been talking about, and that will, it definitely seems that there's going to be a lot of changes to the change of registrant policy, and there is definitely an emphasis on trying to make it simpler. There was even talk about maybe getting rid of it or if it's even needed, but a little bit more, we'll go into the D3 next question regarding that. But the group also kind of discussed how it could use some of the decisions that it made in phase 1a to support a better change of registrant process. The main one, I think, would be the five-day window where the registrar would have to provide the TAC, could be leveraged for an additional due diligence by the registrar.

So for example, if there was a change to the registrant's contact, if there's a change of registrant, however that's defined, or you know, if there's a change to the primary contact method, for instance, within 24 to 48 hours of request for the TAC, maybe that could entail some additional checks or provide a red flag to that registrar. If there was a change of, and also a request, then there could be a way there.

There was also discussed that given that the TAC is now more secure and it's generated on demand, and also the fact that with GDPR, there's the information that would normally be publicly available on WHOIS, is no longer there. So that risk of kind of stolen information is also kind of helping to be addressed by that. And also the fact that from phase 1a, that 30-day lock that would

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follow a transfer of registrar is now mandatory, that would be put in place. So having a 60-day lock that would follow a change of registrant, or if there was a change of registrar and give time for someone to catch it, that's already going to be in place. So maybe there isn't need for that lock.

There was also discussion of maybe enhanced dispute mechanisms, which was largely talked about in phase 2, could help where there's unauthorized activity. That's still up for discussion, but there was talk, for instance, of a fast undo idea. However, the group didn't come to agreement on that, preferring instead that the informal ways of addressing those maybe shouldn't be codified as it allows more malleability, adaptability for the registrars. So that might not be something that's pursued further, but leave it up to the group. But really that five-day window following the request for the TAC could definitely be something that the group decided to look at further. And I'll just kind of leave it there for now, and then we can move on to number three. So leave it up to you, Roger, if anyone has any comments or questions.

ROGER CARNEY:

Great. Thanks, Christian. Yeah, I think that a lot of this, we'll get into it when we cover the definitions as well, a lot of the confusing part is really drilling into, okay, what's a material change and things like that. And again, I think that when we look at these, we've identified some maybe over process in this or whatever it is that I think that we can get to a secure change of registrant with less hurdles and less confusion. And I think that that's what we all kind of saw last year as well. So, I think that as far as this goes, I

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definitely think that we can make this less confusing. So, Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. And I agree. I think we can make this less confusing, which is a win. I semi agree with you that we can come up with a place that we still have a little bit of a safeguard, though, I would warn this group, that real solutions cannot be created by policy. I mean, that is up to a registrar. Christian mentioned something like, when there has been a change of the main account or the main contact person of the account, that it could be additional checks. Sure, that can be, but you can't put that in a policy. I mean, as a wholesale registrar, I have no information at all about what's happening at a control panel at a reseller. I mean, that is not information that is being sent to our API. So, we can't make a decision based on what's happening there. And it sort of flows back to the overall arching issue with policy here and touching upon high operational impact. And just to go back a little bit of history, back in 2017, when the transfer policy was released, we had to discover, when we started coding, that it was one part of the transfer policy, I don't recall which part of it was, but I do recall very clearly that back in 2017, we had to go to the board and explain to the board like, okay, we can't have any ICANN compliance on this recommendation, because that recommendation that came out, we don't know how to go with it. Our programmers are completely baffled on how to do this. And of course, the board agreed with it after some long discussion. But back then, it was for me a red flag, like, okay, in these working groups, we all have the best intentions here. And we want to

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safeguard the registrants and we don't want to have domain names being stolen. But we need to be very careful in our recommendations. Because before you know, you recommend something that cannot be coded. Thanks.

ROGER CARNEY:

Thanks, Theo. Yeah, again, I think that when we look at this, notification seems simple enough when that happens. But also, I think when we discussed this last year, we had talked about if there were changes, then the -- and as you said, Theo, the compliance piece of it, I think kind of falls off the side. But if there are changes, then it's recommended that the registrar do a due diligence before if there's an address change, and then all of a sudden, it's under a new registrant, maybe they look at it manually, whatever it is. You know, I think that idea was brought up last year when we talked about it. So, but Owen, please go ahead.

OWEN SMIGELSKI:

Thanks, Roger. This is Owen. I just want to kind of -- for those who may not be as well versed in the history of this policy as Theo is, when he's talking about going to the board, the thing that we had to get the deferral was for enabling, disabling, or for change of registrant to not apply for enabling or disabling privacy or proxy providers. And then also, it was part for that. And then also, because at the time, when you would transfer a domain name, you'd have to remove privacy proxy so that the gaining registrar could see who was there. And then so, when you would disable

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that, you would then freeze the domain name so you couldn't transfer it. So, that was that at the time.

ROGER CARNEY: Great. Thanks, Owen. Yeah, kind of an endless loop you get into there. Okay. Any other comments here? Or I think we can move on to our last charter question here. Christian, go ahead and take -- Theo, please go ahead.

THEO GEURTS: Yeah. Thanks, Owen, for reminding me and the group. And which now begs the question, do we still need to address it? I mean, is it still an issue or let it die slowly or do we still need to correct this? Thanks.

ROGER CARNEY: Great. Thanks, Theo. And hopefully, yeah, I think it's a bullet that we have to at least address going forward. And maybe we get there just by the changes we're already going to make. But yeah, so I think that's something we have to look at and make sure we account for and have it addressed. I don't want to end up in the same spot when we put this out and then, again, going to the board and asking for a stay on that. So. Okay. Great. All right. Christian, please go ahead.

CHRISTIAN WHEELER: Thank you. Yes, the third charter question that was referring to the overall policy, we've kind of already talked about this a little bit

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earlier. But basically said that the scoping team report suggests there should be further consideration of establishing a standalone policy for change of registrant. According to the scoping team, the policy should take into account the use case where change of registrant occurs simultaneously with change of registrar. To what extent should this issue be considered further? What are the potential benefits, if any, to making this change? And to what extent does the policy need to provide specific guidance on cases where both registrar and registrant are changed? Are there particular scenarios need to be reviewed to determine the applicability of core?

So the group, as [inaudible] previously talked about whether it's better to have it as two distinct policies or keep it as one. And I believe from just previous review of that, the group seemed to align more on actually keeping it as a separate, putting it as a separate policy. But I did want to take a look at the inter-registrar policy and kind of the overlap and whether or not they, these really belong together. And from those discussions, the group did seem to align that a standalone policy should really be looked at more closely. So that's something that this group can look at further as well. And that'll also come into play as the group talks about the definitions and how the definition should change, which we're going to get into next. And then maybe the group can figure out from there where it best belongs. And then if it does become a standalone policy, which might make things clearer for registrants, we're probably—I know from my own experience in global support, very confused that updating their email is suddenly now they're—they think it's a—they didn't transfer their domain, they just updated my email. So that could probably be clarified if the group

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decides to go forward with that. But there will probably need to be some changes then to the recommendations made about the transfer policy previously with regard to when there is a change of registrant, what will that entail as far as inter-registrar transfer? So I'll just kind of leave that there. And then we can move on into a discussion more about definitions.

ROGER CARNEY:

Great. Thanks, Christian. Yeah. And if I recall, again, it seems like we touched on all these at least a little bit last year. So that's great. You know, and the security mechanisms that we put in with group 1A, I think when we look at the specific charter question here about consideration for a change of registrant at the same time as a change of registrar, the security mechanisms that we put in place and notifications, I think, have addressed a lot of those issues there. So I think that, again, I think we're, we're answering these just by going through the process, which is great. But what else? I said another thing on this, but I think I kind of lost it. But anyway. So, yeah, I think that we've made progress. Oh, yeah. The splitting it up into two. And I remember us discussing at a high level about doing that as well. And it sounded like at the time, anyway, again, more than a year ago now, it was more of if we're going to leave anything, it sounded like it would be a high level requirements kept in the policy, whereas the details would be left to the registrar. And again, that was just the high-level discussions we had then. And we didn't drill into those because we moved on to other things. So we're back to that and we'll drill into those ideas. So, but any other comments or questions on this chart question? Okay, great. And again, these were just high levels.



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We're going to drill into these in more detail. And again, look at, as Jothan brought up specific use cases as we go through them and make sure we've got them covered. And as Theo just pulled out of this, the privacy proxy ideas as well that need to be accounted for. So again, we'll drill into those. We just wanted to get those high-level things moving and get people thinking about them. But here, again, I think we're going to jump into definitions and then maybe this is where a lot of the confusing part of the change of registrant happens. So I think as we go through these, it'll be important to think about them. And again, not just what the definitions are, but where should they reside? Is it in policy or is it in registrars' hands making these decisions? Is it split? You know, is there one line that crosses this change of registrant or change of control? But I'll let Christian take us through these definitions.

CHRISTIAN WHEELER: Thanks, Roger. So yeah, moving just through the definitions, you've already heard this before, but it's material change to the registrant's name, organization, and email address. Also the other definitions, including in the policy as well, [inaudible] designated agent as an entity or individual that they've authorized to approve a change of registrant on its behalf. Prior registrant being the entity that has kind of requested at the time of registrants initiated and the new registrant being the entity that it's proposing to transfer it to. So it shouldn't be a surprise. And then material change is a non-typographical correction. So that would be a change to the domain, RNH's name or organization, or any change that's accompanied by a change of address or phone number or any change to the email address. And then here are

some examples of typographical corrections. And it did also say that for avoidance of doubt, nothing prevents the registrar from treating any change of name or organization as a material change. So again, these shouldn't be a surprise to anyone. I think the main question is, is the name, organization, and email address as being defined as a, for a change of registrant still valid?

So the group had actually discussed change of registrants in that definition previously and determined that it's not fit for purpose and had a lot of discussion about whether it should be replaced with instead of change of control because of that contact information is largely incidental to a lot of registrars. However, the email address, for instance, is something that kind of acts as the anchor or that's something that is the main primary point of contact. And so there was a lot of talk about changing the definition for change of registrant to instead be change of control, which could be that primary contact or contactability or anchor contact method. And before diving into these questions, I do also want to raise some of the other perspectives, which was that change of control maybe would be the account or the account holder, because [inaudible] update only matters if the domain is changing accounts and if they're just updating their contact information. However, others had determined, said that the account means something different to different registrars and would be a lot harder to create policy around. So maybe it would be signaled around when a new registration agreement is signed. And that is kind of part of the current change of registrant process, whereby a registrar would notify that they need to sign a new registration agreement. But whether that is, whether it's triggered by a change of name or

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change of email or change of organization or something else, or all or none of the above is what's kind of up for discussion.

So staff has kind of come up with some kind of probing questions here around change of control, because that did seem to be where the group was leaning last year. So I just kind of leave it now to you all to discuss change of control and whether that's something that the group wants to move forward with, or even if it is change of registrant, how that might be updated. So that is kind of the question on the table right now regarding definitions. So Roger, over to you.

ROGER CARNEY:

Great, thanks, Christian. Yeah, and again, I think even though we only had several, maybe less than 10 meetings to just when we talked about this previously, we made pretty good progress, at least down a good thought pattern. So I think that maybe I'll save Theo some talking time here, a lot of this material change or change of registrant, GDPR and other data privacy policies require the free ability for registrants to change their information to keep it current. And the balance there is allowing that to happen, which, I think yeah, that came through by regulation and law. But I think that was kind of an assumed good practice anyway, is allowing registrants to be able to do that. But having to balance that against preventing bad things from happening to their domains as well. But also preventing them and it's the balance of something bad happening versus something that's just normal. And a registrant normally comes in and updates their contact information and during the process of a change. So it's that hard balance of getting there, which we had some pretty good

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discussion last year on it. And it's that process of the registrar and registrant being in close contact that, that those two are the ones that should be deciding and not necessarily the policies. And that's where we ended up with this change of control piece here. So I think these questions are good questions that we have outlined here is, is there an anchor? Is there one piece of information that flags this? Is it different? I mean, per even registrant, maybe they have different preferred contacts and, but again, that gets back to the registrar, registrant relationship. And this idea of the account holder or account being a different level of control or ownership or whatever you want to call it. I think that when we talked about it last year, we were being pretty careful about not trying to introduce account things into policy just because as Christian mentioned, the account concept is different at registrars. So it's not something that is universal, like a registrant is. So thanks, but I'll stop talking and let Theo talk.

THEO GEURTS:

Thanks, Roger. Yeah. So when you look at the change of the primary contact method, I'm not sure what it actually is. But if we are talking about primary account or our primary account holders, when you're talking about sub resellers, that could be a primary contact within the whole reseller sub chain there, that all these sub resellers, but we have, as also, again, I don't know where that is, and who that is. So I think basically, what we need to sort of get to a point like, okay, there's a whole lot of stuff going on a whole lot of moving parts, there's stuff with a GDPR here, there's perceived benefits when it comes to security. And I think we need to sort of

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straighten that out. Like, is there really a security implication here? And that is what we sort of need to move at. Thanks.

ROGER CARNEY: Great. Thanks, Theo. Jim, please go ahead.

JIM GALVIN: Thanks, Roger. Jim Galvin, Registry Stakeholder Group. I just want to make a comment, an observation, if you will, about this issue for consideration. I think that logically, change of control seems like a better model than the old one, for the current definition. And I say that because, to a large extent, for the registration system itself, we don't really care about identity information, not for the purposes of registration. What we care about is contactability. Seems to me that that is the overarching principle that drives the registration system at a top level. And with that in mind, the notion that there should be an email address or perhaps a phone number, maybe those are the two things. So contactability is the anchor. And a registrant should be allowed to choose whatever their method of contactability is. That method might be a postal address, I suppose, but I think that we tend to prefer email address universally. But you think about it in those terms, think about it in terms of change of control, it's about contactability. And maybe you allow the option of a given registrar to offer contactability choices to the registrant, and that's where you draw things from. Especially since, again, we don't really care about the identity. And we don't validate it in any way. People can essentially put anything they want there in principle. I mean, some registries do require additional information, they require the

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registrars to do things. You might choose to want to do things, but there's no universal requirement in that space. So change of name and change of org just doesn't even feel logically correct to me from the way the system works. So just an observation. Thanks.

ROGER CARNEY:

Great. Thanks, Jim. Yeah, and I think that's kind of how we left it last year as well, is it's tough when you're doing change of registrar and there's a material change. And when you get into those details, it's like, well, almost everything becomes a material change, which in practice we realize that's not true. And it becomes difficult. And again, we talk about other forms of contact and everything. We know email is not going away anytime soon. But we do know registrants do have other preferred mechanisms of communication. And yeah, as Jim mentioned, postal address, sure, it could be one of those. It could be a phone number. It could be the email, but it could be something else. And I think that that's where we need to start getting flexible. And I like how Jim put it, the contactability, it's not necessarily one piece of information. It's that piece of information that the registrar and registrant communicate on. And whatever that is, that's the important piece. And when that changes, you have a heightened level of awareness into looking at it. So Christian, please go ahead.

CHRISTIAN WHEELER:

Yeah, I just wanted to note that I believe it's still in effect, the WHOIS verification policy that registrars follow, I believe requires that when a registrant provides or updates their, I believe it's their phone number. And I believe they need to verify that the, confirm

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that the postal address is in a valid format. But I believe that when a registrant updates their phone number or email address, the registrar needs to verify that information. So that's already in place as a separate policy to verify that the phone number and email address are functioning. So I just kind of wanted to throw that in there.

ROGER CARNEY:

Great. Thanks, Christian. Yeah. And I think that where Jim was going on that was the current verification and validation that gets done, according to the registrar agreement, doesn't provide any identity. It just provides verification of that information being correct. So yes, that's a correct postal address, but it doesn't identify that person on the other end. And it's one of those, even the email doesn't identify the person, just makes that email works and it's valid and everything like that. So I think that's where Jim was kind of coming from was it doesn't, the current system isn't an identity system. And I think that that's where it is. Great. Thanks, Jim. I kind of thought that's where you were going. So okay. Yeah. So, and again, I think that we've got to think about that. And again, I think a year ago, over a year ago, we kind of got to that spot and we kind of moved on from it. So I think getting back to that, and that's what these questions really are is, are we changing that concept from, again, what today's policy is, is that very specific change in registrant and material change to any of those data elements versus where we kind of got to last time. And I think, I want people to start expanding and thinking about that. Does that work? Does that make sense? Does that create problems? Are we opening it up? And when you look at it and how Jim described that

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as contactability, again, that mechanism, whatever the registrar and registrant use, however that's done, and maybe it's, as Theo pointed out, maybe it's the reseller doing it, which it happens often where the reseller is handling those things, or it's something somebody else is handling. And again, even if you look at the account concept here, maybe it is the account holder, but it is that registrar, registrant communication channel that's important. And again, it could be any one of those different levels. It's just that one for that registrant. So it's, when that changes, I think that that's when something has to occur. You know, when that changes, is there a notification set to, again, as our definitions kind of showed, does it go to the prior one and into the current one or to the new one and things like that. So I think that that's where we have to start working down that path of, is there policy that can drive that? Okay. If that change of control, whatever that mechanism is, changes, does the old one get notified and the new one? And maybe not. Maybe it's just that the registrar has to validate that or the registrar should look at it, whatever it is, but those ideas are the ideas we need to come up with.

Okay. One of the big questions here is around designated agent. And I know that we've had discussions even today about it, but we had discussions last year about it as well. And even outside of the change of registrar, it comes up every once in a while. And this was probably one of the ones that when we looked at the charter questions, kind of breaks the security model maybe, or the non-security model, but breaks that goal of being hijacked more or whatever. The designated agent and the opt-out provided ways to work around the change of registrant policy. So I think that we would need to come into discussions around both of those

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concepts, obviously, is, does that really serve a purpose? And really the defined designated agent has always been around. As Theo mentioned, the reseller could be the standard de facto, the tech contact a lot of times was this standard designated agent, things like that. So, Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. And indeed, that designated agent has been discussed heavily and there's really some pros and cons against it. But during the IRT work, while we were working on this, essentially the designated agent became more or less the salvation of the IRT. I mean, without it, without a designated agent, you're going to hit so many operational issues, you don't want to know. I mean, you can spend like 2000 hours on it and still not come up with a solution if you remove the designated agent from the policy. I mean, that was back then, like I said, the salvation to the entire policy. Without it, doubt we would even had a policy. So we will still be going back to like, okay, where do we gonna end up with this policy and we also discuss like, maybe we should leave the material change out. And just if there's any change to the registrant data, that the new registrant or the old registrant both get a notification or just a notification if only the name changes. Those are, from what I can see here for .NL, that works pretty well when there's a change of registrant, that the old registrant gets a notification like, oh, there's something up, did I authorize this? Oh, yes, I did it a minute ago, everything is fine. And I think we sort of need to land on that spot there, that we don't have a policy that comes up with a ton of operational nightmares, because due to all the varying business models, and again, the

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security implications, I think they were never really there. I mean, you don't solve these security implications in a policy that needs to be buttoned down by stuff like NIS2 and common sense. Thanks.

ROGER CARNEY:

Great, thanks, Theo. Yeah, and again, I mean, the designated agent, especially when you start getting into, again, the material change of a registrant, being a bit, and if you look at it, I mean, almost everything becomes a material change. That designated agent, again, existed before the IRT, just not in policy. But when that material change came into effect in policy, then you had to codify the designated agent as well. Again, designated agents, to me, have been around forever. It just wasn't codified into policy. So it's one of those where, I think that it's still a great concept, and it's something everybody should recognize does occur. And again, this at very different levels as well the reseller, the tech contact, the account holder, whatever it is, those designated agents do exist and do play a role.

So, yeah, and again, one of the concepts obviously, there's a change of registrar or change of control possible at a change of registrar. But again, I think the security measures we put in for Group 1A discussions really takes care of a lot of that. And to be honest, I think all of that, because it was the discussion we had over the last couple years that a change of registrar or an intra-registrar, I should say, an intra-registrar transfer, so just a change of registrant within the same registrar, is a lot more controllable than it is when it's an inter-registrar transfer. And I think that's kind of what Theo's touching on there, is those security implications are big when you talk about moving from one registrar to another. Still

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important at a single registrar, but it's controllable, much easier to control there. And again, that path back is a lot easier as well. So, I think that those security measures aren't as steep when you're talking about just an intra-registrar versus an inter. So, okay. So, I think from this group's standpoint, I think coming through this, think about if the policies changed from the current change of registrar or change of registrant and material change to that versus this idea of the contactability. And again, we hit on that last year, but Jim brought it up again here. And I think that's the important part, is that's a big change that does allow for maybe a better data privacy, data update by registrants. So, allows them to continue to manage their data efficiently and still allows them to do operational issues with their domain name. But I think moving from that material change to a registrar to contactability is a big step and should be thought out. And again, I think the positives are kind of easy to come up with. It's the negatives that are the hard part. Does it introduce anything that could potentially go bad? So, Ken, please go ahead.

KEN HERMAN.

Yeah, thanks, Roger. Just a quick question for you about this concept of change of control versus change of registrants. And I'd be interested to hear people say, because it occurs to me there might be some issue of ownership and rights to the domain name. Change of registrant implies kind of an ownership of that particular thing, whereas contactability and control is an issue that seems to me totally different. So, I'd be interested to hear what people have to say about that. Thanks.

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ROGER CARNEY: Great. Thanks, Ken. Yeah. And I think that, I don't know if they're completely different, but I think you've drawn a good line there that there is a difference there and a change of ownership being different than a change of registrant in itself. You know, obviously a change of registrant in today's world is updating address. That's probably most of the time, not a change of ownership. Obviously it could be, but I would say generally not that way. Even a change of email, most of the time is not a change of ownership. It's just a change of registrant. And I wouldn't say necessarily even control, just a change of registrant. So, but it's a fine line that you had to look at.

KEN HERMAN: So, are we differentiating then between change of registrant as a concept of ownership and changing just the, kind of the what my email address is and my postal address and all of that? Are we differentiating that in this discussion?

ROGER CARNEY: Great. Thanks, Ken. And I think that we have to look at it. I don't know if we've decided to pull those apart or not, but I think it's worth looking at and discussing. Great. Thanks, Ken. No, I think that's a good point to bring up. Theo, please go ahead.

THEO GEURTS: Yeah. Thanks. And maybe I had 10 meetings, too many today. I'm still struggling with this concept of change of control. What are we trying to achieve there? Maybe I'm missing a couple of points here. Thanks.

ROGER CARNEY: Great. Thanks, Theo. I'll go through the queue and we'll come back. So, Jim, please go ahead.

JIM GALVIN: Yeah. Thanks, Roger. Jim Galvin, Registry Stakeholder Group. I think that Ken brings up exactly the right question that we have to answer and become comfortable with that line. Because for me, that's the distinction between control and change of registrant. And at least the way that I'm thinking about this, just as an observation for consideration here, don't really have any particular choice in mind. But getting to Theo's question about what are we trying to achieve, I'm just having a clean slate and I'm thinking to myself, okay, we've got a registration system here we're trying to manage. And we're talking about transfers within this registration system. And we have this oddity here called change of registrant for historical legacy purposes. And the question is what is it trying to get at and what is it trying to do? You know, I guess back in the day, that was thought of as being a transfer. And now I'm thinking to myself, well, really, is that relevant in today's world? I think the line that Ken talked about is exactly the right line. This is really about the registration at an abstract level. It's about the registration in terms of what the registry and the registrar share. And that really is just about the domain name, not ownership, but who's allowed to do things with the domain name, who's allowed to make things happen. And you want to stay above, you want to stay on the point, which is the relationship between the registry and the registrar, looking at it from a clean slate. You want to stay above the registrant. If you start talking about it in terms of the

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registrant, it occurs to me that that then really wants you to bring into the discussion, what is an account and what's not? You know, it just feels to me like that's the place that you have to get to. And I think that that gets really hard when you start talking about resellers, because now you've got a downstream additional bridge that you're trying to build. And then you add complexities and issues in there. For me, where I'm coming from, the simplest place is to stick to that point, which the registry and the registrar share, which is just about control of the domain name, the ability to do things with the domain name. And that is about contactability. That really is what our whole system is based on, looking at it from a clean slate, rather than trying to explain what was done before and seek to do that. I think let's figure out the problem that we need today to be solved, not think about what problem were they solving back in the day, so to speak. Anyway, just my thoughts. Thanks.

ROGER CARNEY:

Great. Thanks, Jim. And I assume Owen kind of agreed with you there. Okay. Yeah. And I think that's important. I think when we look at, when we start talking about—maybe this last bullet is that one key, is the change of control is when there's a new registration agreement signed or should be signed for sure. That's when the registrar is indicating that someone else is taking over this domain and a new registrar, new registrant agreement, registration agreement has to be agreed to for that new entity, whatever it is. So Steinar, please go ahead.

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STEINAR GROTTROD: My understanding is that change of ownership is definitely a change of some data object for the domain name, but it also includes other elements like kind of a business deal, an agreement between the new owner and the losing or the old owner. And that is something that is not necessarily, no, let me phrase it that way. It is then being taken care of in a more, in a different way than purely a change of address, email address, etc. So I think it's a little bit different process than a change of registrant or change of control because it do have some other elements included into that process. Thank you.

ROGER CARNEY: Great. Thanks Steinar. Yeah. And I'm not sure exactly the thought process when they went through this. When you look at material change of a registrant, most of those things occur in both scenarios. A material change is going to happen when there's a an ownership change. But it also occurs and more regularly occurs when there's not. And it's just a simple update to the registrant there. So I think again, we get back to that material change. It doesn't seem fit for what the goal here is. And I think Ken and Jim are hitting on the goal here. And that's that when there's a change of ownership is when that goes up to a level of awareness that people should be looking at it and making sure that it's going the right way. You know, as Steinar pointed out, there's probably other things going along with it, like maybe it was sold or whatever it was, they just agreed to move and take that change. But from a registrar, registrant perspective, again, it's that contactability or whatever it is, it's that true trigger of when an ownership change is occurring that should be brought up and

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scrutinized. Okay, is that valid? Is it true? Should you get confirmation? Should you whatever it is? Should there be notifications sent? Just a typical material change, as we're saying, and as we said last, probably not. So maybe that's part of the policy. Obviously, we're going to try to update. But yeah, it's this, again, change of control, and not necessarily calling it ownership, but change of control falls along that ownership line. So, Theo, please go ahead.

THEO GEURTS:

Yeah, thanks. You know, listening to that, Roger, I think there's some assumptions there that we simply do not know. Let me break it down a little bit. I think it should be important that we see updates on domain names on registrants all the time. I mean, people move, get a new telephone number, get a different email address. And I'm of the opinion that those should be updated without any restrictions. Now, if we talk about the change of ownership of the domain name, those are assumptions. I mean, you will not know that till there is a dispute or anything or something similar that is going on. I mean, if somebody registered domain name gets married, someone somehow decides that his wife's last name should be included in it. You know, is that a real owner change? And do we really know about it? I don't think so. I mean, that those are just updates. I mean, for all I know, when the company name changes, that is part of a merger. And so there is no real change to that. I mean, it's getting muddy.



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ROGER CARNEY:

Yeah. And I think you really hit on the issue. And I'm sure that's the same issue that the prior group ran through when they when they created the material change concept, is, do you really know, ever, when a change of ownership happens? And I think that's a difficult thing. Sure, you may know, but you won't know all instances that. And again, if the contactability or the main contact method is email, potentially the email goes with the domain. So the email doesn't even change, even though ownership could have changed theoretically. So I think you don't know all instances of ownership changes. You will know some. And I think that, again, when that occurs, are there things that need to happen to make sure, again, that it's not happening illegally or whatever, through fraud or whatever it is. So Theo, your hand's still up.

THEO GEURTS:

And I think you're absolutely right there. That's the question. Like, if there is a happening, my position is, if there is any change, regardless of whether it is email address, telephone number, postal address, whatever, if there are changes being made by whoever, could be a resale, could be a sub resale or sub resale, then I think that the registrant should be notified of that, like this has happened, because that could be important later down the line. It might not be important to the registrant right now, because the change to them is not really material, but it could be material later down the line. But at least you should be notified like, this has happened. And if you initiated to change yourself, that's probably okay. If you didn't initiate whatever change, that is a red flag for you as a registrant there. And you should seek support, make sure that whatever is need to happen. But I think we need to

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be in that spot. And the entire determination like, is this a change of ownership? You know, that is not really up to us. But if it happens, at least notify the registrant like, okay, your company name changed. And you know, we make no determination if that's right or wrong. We just make sure that the registrant gets that notification. And I think that is the least we should do when that happens. I think that is important that such notifications get out. And at least you have that accountability and transparency. This is what happened to the data there. Thanks.

ROGER CARNEY:

Great, thanks, Theo. Yeah. And again, I think you're right. I think everybody kind of agrees notification is great. I think that that's an easy slam dunk when those things change, notification should be sent. But I guess the next question then is, is there something beyond that? You know, is there something past that where, hey, the whole thing has changed, you sent an email, or whatever it is, notification. We know registrants don't always receive or acknowledge or pay attention to notifications. And again, it does become simpler because typically, these are going to be at the same registrar that occurs. So it's easier to get addressed. But is there a step beyond just that notification that, hey, this changed, or not? Maybe that is as far as we need to go. And I guess that's the point of notifications great. And I think everybody kind of agrees, if there's a change to this, the registrant should be, the prior contact should be made aware of it. But is there something else to do? I guess the next question, Theo, please go ahead.

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THEO GEURTS:

Yeah. And to that question, is there a next step or something we can do more? My answer is no, because I have been through that process a couple of years ago, a couple of years long. And I couldn't figure it out back then and I can still figure it out now. So I think that depending on how much we need to satisfy the board here, we either go through that process again, maybe in a more condensed and focused setting. But I think we're going to end up with the same answer. No, that step is not there. Unless we're going to have some major operational impact on whatever business model a registrar has, because that is the entire crux of it. But we came up with the IRT back then, like, okay, if you try to solve this for policy, yes, but that's going to have some major implications. And then it shouldn't be in the policy. So sort of kind of depends on you and the group where you want to go here. I mean, I already made up my mind a long time ago. Just saying good luck there, folks. Thanks.

ROGER CARNEY:

Great. Thanks, Theo. Yeah. And recognize it's not me. It's whatever direction this group goes, we'll take it and we'll present it as the solution. And if it's just that, that, hey, the current change of registrant policy is changed to, hey, when there's a change to any of this data, that prior contact is notified and that's it, then if that's what this group agrees to, then that's what we publish. If the group wants to add something to that, then we talk about that and add stuff to it. But I think that's where we are. So it's one of those, if the group agrees to that, that's where we move. And that's how we put it forward. So, but Ken, please go ahead.

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KEN HERMAN:

Thank you, Roger. Ken Herman for the record. I think you touched on something earlier about at what point does it trigger a contractual change with the registrar? And that might indicate something more intensive, but I don't know enough about that. My real question is how far deep does this go? The changes to the domain name zone records, MX records, et cetera., that's the underlying business [of having the domain name.] Does that also include changes to that where it has a greater impact? Would that be also included in this policy or instructions or whatever we call it? Thanks.

ROGER CARNEY:

Great. Thanks, Ken. Yeah. And it gets into that operational side and probably even beyond. It's interesting. Does that go beyond the reach of what ICANN can do? When you start talking about those kinds of items, I can't say for sure, I haven't thought about it enough, if that's true or not. But yes, you're right. You know, if someone changes name servers, I just don't see that as part of that. But it's a good call out. I don't know. I just don't see that as being part of it just because I'm not sure that ICANN has control of that or as Theo keeps mentioning, I'm not sure we would want to get down to an operational issue like that, where if someone changes their name servers, or like you said, maybe just an MX record or a text record or whatever it is in their zone. To me, that just is beyond the scope of this. So, but that's my thought. Others? And that's a good point, Steinar. I mean, it is true. The registrar may not even know, the DNS could be housed third-party or the registrant themselves could be doing it. And the registrar wouldn't

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know except for communicating what's necessary to communicate to the registry, like in DNSSEC or anything like that.

Okay, I think I'm going to give Theo the credit here and I'm going to throw it out and maybe put it out as the challenge then, does the change of registrant policy, and again, change to simply when any changes occur to the registrant data, a notification is sent and that's all the policy is going to say? Is that where the group is leaning? I saw some chat saying beyond that is difficult. So, is that where the group is leaning toward? And again, don't have to answer. I think Steinar brought up at the beginning, a lot of this discussion should be taken back to stakeholder groups and discussed. Somebody else may see a hole somewhere that this group's not seen, which is great. So, Sarah, so just going to throw out Theo's idea and it's not new from Theo. I think Theo has said this for a long time, that the change of registrant policy should be whittled down to just when there's a change to registrant data, a notification is sent to the prior contact and there's nothing else in the change of registrant policy. Okay, thanks, Sarah. And again, even from taking this beyond and taking it to stakeholder groups and talking about it, I think that's a great starting spot and saying, okay, is that enough? Does that make sense? And if people find holes, great, that's what we want to hear. As Sarah mentioned earlier, I think Sarah said it earlier, it doesn't seem like there's any push for more. So, it'll maybe make change of registrant discussions simple for us. Theo, please go ahead.

THEO GEURTS:

Yeah, and just to know that the notifications, I mean, you could really leave that up to the registrar, how that notification is being

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delivered. I mean, there's a registrar out there who thinks SMS is the best method there to inform the registrant. Sure, go ahead. Thanks.

ROGER CARNEY:

Yeah, and I agree, Theo. It's something that our 1A discussions talked about quite a bit, is that channel. And as Jim mentioned here, it's that contactability that's important. However that communication occurs between the registrar and registrant is the path that should be taken. Now, are there other ones that we, the policy could say at a minimum, it's an email or at a minimum, it's the primary contact method, whatever it is we come up with. So, because again, email is alive, it's not going away, but there are more and more people that avoid email addresses and getting emails. So, Zak, please go ahead.

ZAK MUSCOVITCH:

Thanks, Roger. You all have kind of taken me by surprise. I thought we wouldn't have any proposals to consider for at least eight months. But I'm going to obviously have to take this back to the BC for greater discussion and consideration. But I was just hoping that you and the group could maybe help me out in anticipating a couple concerns that might be raised.

So, the first one is there's an issue for brand owners when it comes to change of registrant in terms of them targeting a brand owner by a letter or UDRP and then essentially the registrant changes. And so, then they have to redo some work, recommence

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UDRP, amend it, chase someone. So, there's that issue in terms of a brand owner interest in a lock following a change of registrant.

The second concern is that if there's just merely a notification requirement upon a change of registrant, what tools will registrars always have available to registrants in terms of addressing an unauthorized change of registrant? Because my concern is that some registrars might have a readily accessible customer support mechanism for addressing this, etc. But others may not. And so, there's a notification and good luck addressing. So, I'm just raising these concerns not because I necessarily disagree with the direction the group has been discussing, but just trying to anticipate a couple concerns that might come up right off the top when I go back to the BC. Thanks.

ROGER CARNEY:

Great. Thanks, Zak. Yeah. And I think all good questions as well. So, Theo, please go ahead.

THEO GEURTS:

Yeah. And those are indeed good questions and answering number two is pretty easy. I mean, I don't think that registrars should be in a position to make any determination if these changes are allowed or not allowed. I mean, it all boils down to make sure that you have an account with a registrar that does good security. And if your registrar does not offer multi-factor authentication, well, maybe you should change the registrar. I mean, that's the best advice I can give anybody here. And then on number one, I didn't quite understand that. Maybe I'm just overly

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focused on process and operational issues mostly. But when a UDRP is filed, I need to put in all these kind of locks and promise the UDRP provider that there will be no change to the register data whatsoever. So, I don't see how that issue is going to materialize that Zak described, but maybe I didn't get it quite well. Thanks.

ROGER CARNEY: Great. Thanks, Theo. I'll go to Zak real quick so he can.

ZAK MUSCOVITCH: Yeah. Thanks, Theo. Yeah. I understood the point about once a UDRP has commenced, the registration is locked. I guess the concern here, we previously raised this in earlier discussions, is that sometimes a brand enforcement is commenced by a letter and a UDRP is prepared in the meantime. And then if there's a change of registrant in response to that demand letter, for example, and there can be repetitive changes to a registrant without any locking mechanism, then that causes concern for brand owners in the course of policing their brand.

ROGER CARNEY: Great. Thanks, Zak. Sarah, please go ahead.

SARAH WYLD: Thank you. Hi, this is Sarah. I had raised my hand a moment ago just to respond to some of what Zak had raised about ownership of the domain and processes around that. Mostly just to say, I



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think the direction that we've kind of started considering as a group is the right direction. I think we should just move to a notification process. And actually, I kind of wonder how that would overlap with the existing requirements to validate and verify registration data. So, when there's a new set of registration data that's never been verified, the registrar has to do that, has to contact the domain contact person and get them to verify that it's correct. And that's part of the WHOIS Accuracy Program specification to the RAA. So, I wonder, we're not going to update the RAA through this policy exactly, but I just do feel like there's a connection between those concepts. And so, we should consider that. But I don't think that we need a more robust approval process. I think we just need a notification. And then the verification would take care of approval for new contact sets. Thank you.

ROGER CARNEY:

Great. Thanks, Sarah. Yeah. And I think, and Sarah, correct me if I'm wrong, I think that the RAA is specific on email and phone for verification only, email or phone, I should say. So, I think that the other data elements still are applicable when that happens. So, great. Thanks, Sarah. And to Zak's point, I think if it is a notification, good, but is there an escalation path to the prior contact? And does that need to be policy or does that need to be discussed or anything around that? So, I think that's a good point. Theo, please go ahead.

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THEO GEURTS: Yeah. And I think when Zak goes back to his group, sort of hash that issue out, because when I was going through it in my mind, I'm going like, how do you even know there are changes being made? I mean, most of the data is redacted. So, yeah, it sounds like an edge case, but maybe it's not. So, maybe we can hear back soon. Thanks.

ROGER CARNEY: Thanks, Theo. Okay. I reckon, just realized we have one minute left. I thought we were doing good on time, but we have filled up this time. Okay. So, good discussion. And I think if we take that and take it down to that stripped down thought of, okay, just that one thing, notification, and then go from there, what are the issues? Discuss it with your groups. Does it make sense? Does it need to be more? Does it fit? Does it not fit? I think all those are appropriate, so we can get to that. So, and again, it seems like a notification on any of what we would consider today a material change is basically what I'm hearing. And a notification is sent. So, think about that, talk about it. And again, we won't meet next week. It'll be two weeks. We'll pick up this discussion and move it forward. So, okay, great. Thanks, everyone, for the great discussion. And we'll talk to everyone in two weeks. Bye.

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