

## TRANSCRIPT

### Framework of Interpretation Working Group Call

12 January 2012 at 13:00 UTC

Keith Davidson: Okay. I think it's five minutes after the scheduled time, so please everyone, can we make a start, and welcome to 2012 to everybody. I guess a few of our regular participants aren't on the call and probably because it's still holiday time for some. But, never mind, they can catch up on the next call, I guess.

We have an agenda up on the screen. There have been no comments on the e-mail list to suggest there is anything wrong with that agenda, so I think we should go with it. The first item on the agenda is who is present and apologies. Christina, can you let us know?

Kristina Nordstrom: Sure. From ccNSO we have Becky Burr, Keith Davidson, Daniel Kalchev, Patricia Poblete, Kathryn Reynolds, Nigel Roberts, Bill Semich, and Dotty Sparks de Blanc. From Liaisons we have Cheryl Langdon-Orr; from Staff Support and Special Advisors we have Jaap Akkerhuis, Bart Boswinkel, Kristina Nordstrom and Bernie Turcotte. And apologies from Desiree Milochevic, Martin Boyle, and Eberhard Lisse.

Keith Davidson: Okay. Thank you, Kristina. Any further apologies? Everyone who was mentioned on the call, okay. Moving right ahead, then. We had the meeting notes from the 8th of December circulated and they're up on the screen now for those who are connected through Adobe Connect. Bernie, there were a couple of points on here that I think were worth talking about. Do you want to go through that for us now?

Bernie Turcotte: Yes, sir. We usually don't go through minutes, but there was quite a bit of material, and I tried to do my best to capture the spirit, but I'll be glad to take adjustments and corrections.

For the item No. 2, meeting notes 24 November 2011, Kim noted that he had provided his apology, corrected that. Bill noted the revocation process and the meeting notes were accepted with those amendments.

Third point, significantly interested parties, Nigel noted Section 7.1.1.1.1 had the errant comma. Given there were no material changes, the chair asked for final approval. The chair noted that staff would provide the working group with a draft SIP public consultation for 5 January for the 12 January meeting, which is this meeting, which was done.

Terminology. Significantly interested parties, proposed definition of "significantly interested parties," which was identical to the one provided in the SIP document 2.9 was unanimously accepted. So, all those things were not a huge problem, I don't think. Are there any comments up to that point?

Keith Davidson: I think it's probably worth noting that Eberhard seems to still have a problem with some aspect of that document, but I'm not really quite sure and without him on the call it's probably unfair to talk about it. But we can catch up with Ed at a later time or since we have the -- oh, and Nigel. Nigel has seen this.

Nigel Roberts: Yeah, I have a couple of issues with 5.1.5

Bernie Turcotte: We're not doing 5.1.5 now. We're up to 5.

Nigel Roberts: It's on my screen, sorry.

Keith Davidson: We're just dealing with everything up to the point of revocation.

Nigel Roberts: Can we scroll back and show me what you are dealing with, please?

Bernie Turcotte: We just finished talking about it, so approving 24 November meeting notes with two minor corrections.

Nigel Roberts: Yeah, we're happy with all that. I thought we'd gone past that.

Bernie Turcotte: No, no, we're --

Keith Davidson: I was just saying that Eberhard seems to still have a problem with something in the significantly interested parties paper, but we can leave that until the next call when Eberhard is available to tell us what he is disagreeing with.

Nigel Roberts: He can bring his cutting wit.

Bernie Turcotte: Yes.

Nigel Roberts: That's what he's doing at the moment, cutting.

Keith Davidson: So, moving on, I think, Bernie.

Bernie Turcotte: Thank you. Revocation, 3.0. Section 3.1.1, 5.1.1, Nigel usual noting the spelling of misbehavior versus misbehavior.

Nigel Roberts: Bernie?

Bernie Turcotte: Yeah?

Nigel Roberts: Can I apply 5.1.1 to 5.1.5, please?

Bernie Turcotte: Sure. But we'll finish running through the other sections. I think what I'll do is we'll really take them one-by-one given there is a lot of material here. 5.1.1 okay, Nigel?

Nigel Roberts: Uh-huh.

Bernie Turcotte: You intended the first and last paragraph of 3.4 of RFC 1591 that are quoted are relevant to the discussion. I think that was clear from the notes that's what you

were saying. Bill, contrary to NR does not think that any of this section applies to revocation of delegated ccTLDs. I think that was clear from the notes, too.

Chris Disspain does not agree with Bill Semich's proposal that Section 3.4 of RFC does not apply to delegated domains; I think that was clearly documented, too. 5.15, Nigel noted that he would expect IANA to have some reserve power if a manager has significantly misbehaved, correction on the misbehaved in the text noted. I hope if there is substantial -- and I quoted from the transcript just to make sure I was trying to get this right. So, up until 5.5, are we good?

Nigel Roberts: We're probably even good on 5.5. I think the word "is" should be "has."

Bernie Turcotte: We'll go through that, okay.

Nigel Roberts: But actually it's been pointed out to me that --

Bernie Turcotte: But that's cut and pasted from the transcript, Nigel, so I was not trying to correct it.

Nigel Roberts: I was probably mumbling. It was late at night. What I would say is that it's been pointed out to me that what I'm driving at here, and I think you have captured it entirely accurately, is dealt with in some other way under the expression "persistent problems." I just note that in passing and maybe we can deal with that in the relevant place. But I kind of agree with that. Eberhard said something along those lines, I believe.

Bernie Turcotte: Okay. So, up until 5.15, we're all good?

Nigel Roberts: Yeah.

Bernie Turcotte: All right. Moving on. 5.16. Martin Boyle has difficulties that we can artificially split up this section so that part of it applies to delegated domains and not others, disposition is supported by [CLO]. Eberhard Lisse disagrees with Martin. Charter of the working group is to look at each section and see if they are applicable or not. Martin Boyle agrees with this, noting that it is important to always look at a document in its entirety, especially when it comes to RFC 1591 and the GAC principles. The Chair noted this will conclude the discussion on this section for this meeting to allow us to move on. So, that would conclude the notes from our discussions on 3.4. Any comments, questions, corrections? Okay.

Moving on to 5.2, Section 3.12 of the document, which is about Section 3.5 of RFC 1591. Nigel: Originally this clause was concerned about the zone file not going down. However, this was over at Akidogo and things have changed substantially, and we may need to interpret this in the context of all of the operations of a ccTLD.

SD: This could take us into policy development, which is beyond the scope of this working group. Nigel: This is borderline. Chris Disspain: We need to be very careful; we do not want to step over this line. Keith and Eberhard were in agreement. Martin Boyle: We have to be careful to capture the global meaning and intent. The Chair closed the discussion of this section for this meeting. Is that okay for everyone? Not hearing any questions, comments or corrections, I will take it as okay.

5.3, Section 3.2, GAC principles 2005. There is an extra zero there. GAC comments, 2050, although it might make an interesting movie title. Martin Boyle: Although the GAC principles do not directly refer to revocation, they have many points which are relevant to its discussion and the group must consider the document as a whole. Eberhard does not agree with Martin. Bill Semich: It is important to note that the GAC principles in Section 1.3 clearly state they are not meant to be binding. Martin: Yes, this is correct but we'll have to have the discussion with GAC members of this group regarding the nature of the advice. And that closes off 5.3, which is about the GAC principles 2005. Questions, comments? Okay.

5.4, IANA process for delegation, redelegation. Martin: This is relevant when considering derelict managers. 5.4.2, Nigel objects to this being included in this document given it does not deal in any way with revocation. Bill Semich and Eberhard support this. That was for the IANA process of delegation and redelegation. Does that capture our thoughts when we talk about that? Okay. Slide 5, Section 5 of the draft version of the revocation report. Nigel generally agrees with this. Nothing else on 5.5?

Okay, 5.6 deals with recommendations. 5.6.1, Nigel generally supports recommendation 6.1.1 in the revocation document. 5.6.2, Eberhard revoking the right for the incumbent or revoking the right of the incumbent to be clarified with Becky, who was not on the call, I believe. And Nigel points around the use of the term "delegation" in 6.2.1, which was talked about in the past.

Eberhard believes the proposal to have the FOI working group frame the development of process and procedures for revocation as described in Section 3.5 of RFC 1591 would be developing policy. As such objects to this. Keith noted that he does not think this is policy development in any way but rather very similar to the work the working group agreed on for consent.

Minor correction of 5.6.4 there. 5.6.5, Section 6.3, if this is simply advice to ICANN and IANA, they do not have to follow it. BT noted that as per recommendations of the DRD working group that if the ccNSO concludes that the ICANN and IANA are not following the recommendations, that ccNSO can launch a PDT with respect to the topic, the results of which will be binding. Bill on Section 6.3.1: Concerned about the level of detail in the document. BT noted this was an early draft and the text causing concern should be removed for future aversions.

Eberhard on 6.3.1. If you're trying to follow this, this is Section 5.6.7 of the meeting notes. Eberhard believes 6.3.1 is [involving] policy and prejudice on the US DOC contract with IANA. 5.6.8, Keith Davidson: We always have to be vigilant for this, but this has a similar comment as per the previous point. 5.6.9, Nigel and Martin: Section 6.3, overly prescriptive and beyond the scope of the working group. 5.6.10, Martin Boyle: 6.4.1, does not agree. The working group should be developing criteria for defining its behavior, as this could be dangerous. 5.6.11, Eberhard: Section 6.4.1, agrees with Martin and notes this seems to impinge on the US DOC/IANA contract.

5.6.12, Nigel: Raising of points relevant to IANA reports. 5.6.13, Eberhard has looked and the FNOI and IANA should not develop policy. 5.6.14, Keith Davidson agrees but it does not mean IANA cannot participate in a process that is external to it.

5.6.15, Keith Davidson: Key points should be put on the working group mailing list for discussion prior to our next meeting. We're almost there, guys.

5.6.16, Nigel: IANA should not interpret policies. This is the responsibility of this working group. Eberhard: As requested previously, we need to differentiate between the IANA function and the IANA contractor in these documents.

That closes the wonderful Section 6 of the revocation document. Comments, corrections, etc.? Nigel?

Nigel Roberts: Hi. It just takes a little while when the line is on mute to respond, particularly if you press the wrong button. Typographical pedantries on the chat room.

Keith Davidson: Thanks, Nigel. Bernie can pick that up. I mean, this is only meeting notes.

Nigel Roberts: Sure. That's why I'm not going on about it.

Keith Davidson: Thanks, Nigel. Okay, and that really brings us to a conclusion of the meeting report for the December meeting. And I'll assume that everybody has had their opportunity to having put a lot on our read-through, so unless there is anything else, we'll approve that as an accurate recorded meeting and move on to the consent document, item 3 on the agenda. And we have noted the review of GAC input and to consultation. And this is for you, Bernie.

Bernie Turcotte: Well, it was really a placeholder as a reminder. If we remember, we closed off the public consultation on consent in December with no real comments being submitted. And we mentioned to our GAC participants and tried to get the message through all the way to the GAC that obviously if we had closed the public consultation that we would still take input from the GAC on this up until probably the end of January or even a little later.

To my knowledge we have not received anything and I thought that we should probably agree that we need to, at a minimum, contact our GAC reps, which we haven't seen on calls for a little while, and sort of ask them at least what's happening and if they could tell us what's the status of that over in the GAC, so we'll know how to get ready. And all this with the idea that we have something for the meeting in Costa Rica, so we can decide what to do with that. Over to you, sir.

Keith Davidson: Okay, thanks. Bart has a comment to make, I think.

Bart Boswinkel: Yeah, just in addition to it, from a formal point of view, say we as staff need to complete the public comment with, say, an overview of comments. That is very simple, but the working group needs to draft a final report as well on the recommendations for this in order to get it adopted by the ccNSO and the GAC. And that needs to be done reasonably quickly in order to get it out to the GAC members in Costa Rica.

Keith Davidson: And was that the sound of you volunteering to do a draft of that?

Bart Boswinkel: Yes, I think that is Bernie and my task to do (inaudible), isn't it?

Keith Davidson: Excellent. Okay, so I think there are two action points arising: One is to -- an action point for Bart and Bernie to prepare a summary on the recommendations for both ccNSO and GAC use. And the second action point is for Bart and Keith,

I guess, to follow up with raising the -- or entering some dialogue with the GAC, whether or not they will be making any input into this document.

Unidentified Participant: Yes, and I think one of the opportunities is to use the (inaudible) into -- we'll face the same problem again probably with the significantly interested parties, but say if possible they need to have it on their agenda in Costa Roca as well, to support the recommendations of the working group, to move forward.

Keith Davidson: Yeah, sure. It sounds like the GAC is going through quite a few problems other than just the gTLD, sort of (inaudible) that is happening at the moment. So, I imagine we're not high on their priority list. But at least if I can talk to Suzanne and Frank and we can perhaps follow up with a conversation with Leslie and Heather. And at least we can do our reminding to the GAC of our desire for them to participate. We can lead the horses to water but we can't make them drink, so we'll do everything in our power to ensure that they're aware of the opportunity.

Okay? Excellent. If there is nothing else on that point, can we move on to the item 4 on the agenda, the significantly interested parties, public consultation, and we have a document there. Bernie, do you want to -- is there any need for us to go through the document or is it just a question of signing off it and getting it out for public consultation?

Bernie Turcotte: I think it's up to the members of the working group. What I will say is -- Kristina, can we get that document up, or do you want me to try and put it up -- is that it's almost a carbon copy of the consent document, obviously, purely based on the SIP document we agreed to on the last call, so there are no surprises there. And the general text that we have is the same as -- let me put up the document here.

Bart Boswinkel: Bernie, while you're doing this, let me say a bit about the process, because as a result of the ATRT recommendations, the public comment process has changed a little, in fact, significantly. What will happen is there will be first a period for public comments and directly followed by a period for replies on public comments. Now, nothing will happen if we don't have any public comments, but this will extend the public comment period at least for 21 days, the overall. That was all.

Bernie Turcotte: Okay, thanks, Bart. So, we've got this on the screen now and we've got the basic structure of the document, the executive summary, definition of significantly interested parties as per the document, the recommendations 2, 3, 4. It would be most helpful input and feedback from the community with respect to the following questions, which are the same questions from the consent document. Is the approach used by the FOI working group satisfactory? Is the documentation that was analyzed and identified on these issues comprehensive? Did issues identified by the FOI working group for this topic capture the major problems associated with it? Are the proposed guidelines effective solutions for the issues that were identified? Are the recommendations effective in addressing the concerns raised?

And after that we retake various sections of the document and present them in a format so people can have a look at them. I personally don't see the point of going through this in great detail unless people have very specific questions on it. I would say the parts I've just shared about us clearly presenting the recommendations that were approved at the last meeting and the questions which were exactly the same as the consent document basically frame what Bart and I have done here. Over to you, sir.

Keith Davidson: Thanks, Bernie. Any comments? If there are no comments from anyone, I think we should proceed to accept this as the public consultation for the SIP. Cheryl is indicating her happiness by clapping. I can't quite see that little --

Cheryl Langdon-Orr: Oh, well.

Keith Davidson: That's a new --

Cheryl Langdon-Orr: No, it's always there. I just don't use it very often. It takes a lot to get me that excited. (Inaudible)

Bart Boswinkel: Okay. Okay, so, let us proceed, then, with the opening of the public consultation process for the significantly interested parties document. Thank you all. I'm sorry, was that someone making a comment? Okay. Let's move on to item 5 on the agenda, and the revocation topic. And we've had some discussion on the list of some points, and, Bernie, I think you first provided us with a summary of those comments and the discussion, so walk us through it. What have we resolved and what remains to be resolved?

Bernie Turcotte: Yes, we have had several e-mails including the e-mails from Eberhard from this morning, which are not on the report that was constructed for the list and distributed on the 5th of January. Obviously, we'll go through, for those that didn't have a chance to catch up over the holidays with the contributions, we'll go through the comments that were made before or prior to the 5th of January.

From Daniel: I would rather replace currently delegated with already operating ccTLD as it was commented already. CcTLD may be currently delegated but not operational, so we are talking about already operating ccTLD (inaudible) look at. In the past there were cases where certain interest groups woke up to discover (inaudible) the fact that the management and national asset that is the territory in the Internet already granted someone they never heard of. Those special interest groups sometimes happen to have good connections with governments. It may be argued that (inaudible) always have connections with governments (inaudible) study.

Since 1591 was published after a few such cases where already happening, I believe Jon Postel uses this language to tell those people that they are not going to have IANA remove a particularly suitable cc manager just to please someone. It is my opinion that if a cc is already operating, it is way too late for any contending party to agree who the suitable manager should be. There is already (inaudible) for that ccTLD. If we talk about interpretation of this text for today, surely ICANN has existed long enough, had enough opportunities to fix such cases and is simply inappropriate today to claim that any party should have any say in selecting who the current ccTLD should be, which implies replacing the current manager.

However, in cases of substantial misbehavior, IMS should have a chance to rectify the situation by, first of all, informing the relevant cc manager, then by assisting them in correcting their misbehavior, then by proposing they select someone to replace them, then all this failing, by soliciting new recommendations from the SIP.

So, answer to questions: Does the substantially misbehaved paragraph apply to delegated ccTLDs or not? I believe yes, considering my comments above. (Inaudible) way possible, offering whatever assistance is necessary to the existing ccTLD manager possibly by involving other ccTLD managers who might

provide support and advice. If all efforts fail, this needs to be heavily documented, then seek redelegation of ccTLD. Primary purpose of IANA is to oversee the DNS hierarchy is functioning well. IANA and ccTLD partners in this endeavor should help each other to achieve common goals. And that was the end of the comment from Daniel. And given this was direct, I don't think there are any questions about it.

Next, I've got the points from Nigel. We are required to construe the expression, would the IANA step in? This is an extremely important definition because it tells us what the nature, if not the extent of Jon Postel's powers as IANA were, as set up by Jon Postel himself. It is another question what the basis of authority for any other parties purporting to exercise those powers might be.

So, we have to split the interpretation into, first of all, what is the construction of the IANA in the context of RFC 1591? This is not necessarily the interpretation of the expression that we use today with the distinction between function and contractor that are being suggested. Fortunately, we have a precedent to help us here, and the more important part we need help with is "step in" so that can be put on one side for the time being. So, how is "step in" to be interpreted?

As usual, an interpretation, we should first use the dictionary as an aid to construction and only if that produced (inaudible) answer would we look further. The Cambridge Dictionary definition says that it is to become involved in difficult situation or argument in order to help find a solution; to invite; an outside buyer has stepped in to save the company from going out of business; when the leading actress broke her leg, Isabel stepped in and took over. I submit this is right on point. The Free Dictionary, which is American English, appears to be in agreement. Step in to enter into an activity or a situation, to intervene. There is hearsay evidence that whenever there was competition for an as yet not existing ccTLD, Jon's policy was a creative sitting on of hands telling the applicants to sort it out between themselves, but this backs up that policy.

Thus, I submit that we can start to interpret policy statements that IANA tries to have any contending parties reach agreement amongst themselves, blah, blah, blah, as follows:

Whenever at or around creation time here arises an argument between two or more parties over who runs a ccTLD, the IANA intends to act as anonymous broker and will encourage the competing party to discuss. This is implied in reached agreement. Only in the case where the IANA has selected a manager and it emerges that there has been substantial misbehavior in the process of application by a successful applicant would the IANA reverse the decision to designate that successful applicant.

Nigel had further comment: I would prefer existing to in the root. Quite possible to have designated manager for ccTLD without the ccTLD being delegated. That is to say, not in the root.

And I think that sort of covers the comments. If we go to what Eberhard posted today and Nigel, I guess.

Keith Davidson: Just before we do, Bernie, Nigel has his hand raised. Nigel? Nigel, you're still on mute.

Nigel Roberts: I think I put it down again. Bernie, just a quick question. Can I move this thing backwards and forwards, or do I always have to look at what you put on screen?

Bernie Turcotte: I thought you could look at it the way you wanted to, was my understanding.

Cheryl Langdon-Orr: No, you haven't given us scroll capabilities.

Bernie Turcotte: Okay, where would you like it, Nigel?

Cheryl Langdon-Orr: You have to (inaudible).

Nigel Roberts: I think there was something helpful I was trying to say about two pages ago, but it can't have been that important, so I'll defer to carry on.

Bernie Turcotte: Okay. And, as I was saying, we got some comments from Eberhard on 3.4 this morning: My position that 3.4 clearly does not apply to current ccTLDs. We need to consider existing rights and, of course, 1591 does not apply retroactively.

And the contribution by Daniel is excellent; however, I do not agree that substantially misbehave gives anyone the right to unilaterally step in. But in case of persistent problems, the IANA function contractor should, of course, do everything in his powers to assist resolving the situation. I have come to the conclusion that whenever someone, like it or not, we can only succeed in interpreting policy and produce when we take existing rights and what is called legitimate expectations into account and repeat by demand that we need to assess whether the new IANA function contract specifically affect our deliberations.

Let's see what else we've got. And Eberhard providing his apology and Nigel wanting to be (inaudible). There we go. So, that's the sum of the comments. We've got Daniel, we've got Nigel twice, and we've got Eberhard. So, that's all the documents I have. Over to you, sir.

Keith Davidson: Thanks. Bernie, any further comments or discussion on these issues is raised? Bill?

Bill Semich: Yeah, Bernie, I recall making some comments. Did I just miss your presentation of it or what?

Bernie Turcotte: Maybe I did not find them in my e-mail list, so if that's the case I'll go through it again and make sure I correct that, Bill.

Bill Semich: Yeah, there was some back-and-forth that actually included Nigel and Al with relation to my comments.

Bernie Turcotte: Okay. So, maybe if you could just forward it to me I'll just re-include that. I might have missed it.

Bill Semich: You don't need it now, right?

Bernie Turcotte: No, no, no. No ill will intended, but as I was getting --

Bill Semich: No, I was just trying to figure out what I should do with all these open windows on my screen.

Bernie Turcotte: Just forward them to me after the call and I'll --

Bill Semich: Okay.

Keith Davidson: I think, Bill, I think you were essentially agreeing that misbehavior needed a tighter definition and how it applied to existing delegation holders or whatever. So, yeah, quite a useful point and should be taken into account. I think there seems to be fairly broad agreement on some principles from everyone in regard to the idea of what misbehavior and its applicability. So, I think that will be useful to help us get somewhere with some solid (inaudible) that everyone will accept. So, is there any further discussions on any of these aspects? Nigel has his hand up. Nigel?

Nigel Roberts: My line has been unmuted. I hope it has. Just a very brief point. Misbehavior has got to include, as an example, the possibility that somebody on making an application has misrepresented something. Substantial misbehavior might be the fact that he deliberately misrepresented something. So, I think we should be looking in those areas.

Keith Davidson: Okay, it's Nigel. Any further comments? If not, I think we have enough there, Bernie, for us to continue wordsmithing.

Bernie Turcotte: You want to try, sir?

Keith Davidson: And was there anything else in terms of the revocation document? Gosh, thinking way back to last year on our last call, I can't remember, did we manage to work our way through the entire document on that call?

Bernie Turcotte: I think we did. Yeah, went all the way through all the recommendations at the end.

Keith Davidson: Okay. So, we've got reasonable agreement other than these sort of minor principle issues, and I think we can continue to wordsmith and progress there for our next call. If there is no other comments, I guess we can move on our agenda and our preparations for Costa Rica.

It's (inaudible) to me that we are still making good progress, but we have, I think, three more meetings scheduled after this one between now and Costa Rica, which probably should be enough time for us to get through most of the revocation document and have fairly broad agreement. Or, if there are any points of disagreement that we can work very hard on getting those resolved at ICANN Costa Rica. So, I think we're on target.

So, just a question for working group members to contemplate, too. We normally try and meet twice at every ICANN meeting: once on the Sunday afternoon and once on the Thursday. One of the prime reasons of meeting on the Sunday afternoon was to enable the GAC participants or people from the GAC who might be interested in the topic to attend and participate in one of our meetings given that a lot of the GAC use to disappear from ICANN on the Wednesday afternoon and weren't around for Thursday calls.

But now it appears that GAC area around on Thursdays and also are very busy on Sundays, so my thought is that perhaps we should look to just having one working group meeting at each ICANN meeting, and that would be normally on the Thursday afternoon.

I don't think we need any formal resolution on that, but I'd invite anyone who disagrees to voice an opinion of disagreement at any point and I'll talk about this a couple more times between now and Costa Rica. And unless I hear objections,

I think we'll move to having just the one meeting on the Thursday from Costa Rica onwards. Okay?

Other than that, our next meeting is scheduled for the 26th of January at a far more kindly time for me of 2100 UTC, not so kind for some of the participants. So, other than that, unless anyone has any other business, I think we've come to the end of the call, just in time for -- I see Stephen Deerhake has just joined the call, so just in time to conclude tonight's call. So, unless there is anything else.

Unidentified Participant: All good.

Bart Boswinkel: All good. We'll talk to you all again on the 26th. So, thank you all very much for your participation and we'll see you all again then. Thank you.