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BARCELONA – GAC: ICANN63 Communique Drafting Session (2)  
Wednesday, October 24, 2018 – 14:00 to 15:00 CEST  
ICANN63 | Barcelona, Spain

MANAL ISMAIL GAC CHAIR: So now as we have the co-chairs of the CCWG on WorkStream 2, then we will start with this discussion and then move to the communique later. So first of all, thank you very much, Thomas and Jordan, first, for being with us here and second. for doing it on a very short notice. And apologies for the last minute request, but we were discussing the communique drafting yesterday, the part on the Cross Community Working Group WorkStream 2 recommendations.

And as you may know, there is no consensus within the GAC on some issues. So we thought it may be good to have you here in the room just to make sure we are taking an informed decision as we proceed with the language of the communique. So shall I defer to countries who were seeking further clarification maybe to ask their questions or make their points? U.S.

UNITED STATES: Thank you. And I apologize, I'm going to be kind of reiterating points that were made to us last night as part of the conversation. So this isn't necessarily the views of the United States. But it was articulated that the suggestion, as it's currently drafted in the report, of considering initiating another multistakeholder model on the issue of

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jurisdiction, that that indeed was actually a recommendation. And I think there is some you know - we're trying to figure out if that was, in fact, the case.

There's recognition that the suggestion was made under the recommendation, but there was discussion as to whether or not perhaps the wrong word was used and, in fact, the creation of this multistakeholder discussion round two, for lack of a better word, on jurisdiction was actually a recommendation. So that's my question and I just wanted to get some clarity. But there might be others with questions as well. Thank you.

MANAL ISMAIL GAC CHAIR: Thank you, U.S. And thank you for helping me to frame the issue. I'm not that deeply involved in the process so it's more accurate that things come from the floor. So, Jordan.

JORDAN CARTER: Thank you, U.S. Thank you, Chair Manal. Jordan Carter, the ccNSO appointed co-chair of the CCWG. All of the text in the first part of the report is recommendations. So the thing that you have to ask yourself is, what does it say? This one says, 4.3, further discussions suggestion. And there's a couple of paragraphs of text and then it's the subgroup suggests that another multistakeholder process of some kind should be considered to allow for further consideration of these concerns, blah blah blah.

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So there is a suggestion that another process should be considered. And the group didn't agree by whom, in what forum, or anything like that. So our understanding, and I paid very close attention to this as we were coming to the end of the point, was that it was a suggestion for the chartering organizations and the Boards to consider. The recommendation text does not require ICANN to convene such a process or anyone else to convene such a process. It suggests that it be considered. That's the limit of it. There was no consensus to go any further than that in the CCWG. I hope that's helpful.

MANAL ISMAIL GAC CHAIR: Yes, Brazil, please.

THIAGO JARDIM: Thank you very much, Manal. Thank you for the co-chairs for coming and meeting with us, the co-chairs of the CCWG. My question is whether the, what I would call for lack of a better word, recommendation number 4.3 is one of the, again, for lack of a better word, recommendations that have been submitted to each of the chartering organizations for approval? And if approved, they will be transmitted as recommendations to the ICANN Board? To give you perhaps, more context for those who are not with the text in front of them, recommendation number 4.3 is the suggestion that Jordan just referred to. It appears in the text under subtitle number 4: Recommendations on Jurisdiction.

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And after this, we have four sets of again, for lack of a better word, recommendations. 4.1: recommendation to do something, 4.2: recommendation to do something, and then we have 4.3 which doesn't even start with the language recommendation. It reads as further discussions on jurisdiction where unresolved jurisdiction concerns, within parentheses, suggestion.

So again, my question is, is 4.3 a recommendation within the meaning of the CCWG charter, which would mean that this is language that is subject to the requirement of approval by the GAC as well as the other SOs and ACs? And that once approved or if not approved, depending on the discretion of the CCWG chairs, will be transmitted to the ICANN Board for consideration? Thank you.

MANAL ISMAIL GAC CHAIR: Thank you very much, Brazil. Jordan.

JORDAN CARTER: Yeah, thank you for that question, Brazil. The answer to the question is yes, it is a recommendation like all of the others. And so what its meaning is, is embedded in the wording of the recommendation text.

MANAL ISMAIL GAC CHAIR: Thank you Jordan. Iran, please.

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IRAN:

Thank you, Manal. I think all of us here are members of government, and these members of governments are also acting on other forum of government such as ITU. In ITU it is a known fact that you have a recommendation, sometimes you have a clear-cut recommendation titled recommendation 1, 2, 3. Sometimes you have a note to the recommendation which has two aspects or two applications. Sometimes the note is an integral part of the recommendation. Sometimes the note is a description of the recommendations.

I don't think that paragraph 4.3 is merely a suggestion. There are no suggestions. There is part of a recommendation whether an integral or a descriptive part of the recommendation. The acceptance of those two recommendations was subject to that note. Without that note, people could not agree to that.

There was a lot of effort and we thank the chair of the group, who made tireless efforts to finish this recommendation. But we should not categorize the paragraph 4.3 simply and merely as a suggestion for which there was no consensus. I don't think that that reflects reality. The reality is that the acceptance of those recommendations by so-called consensus, in general terms, was subject to agreement on that text and that text was agreed. It may not be a recommendation because not recommendation 3. It was just recommendation 1 and 2. But we have this note that applies to the whole process. So I don't think we should categorize as purely a suggestion. We should not categorize it as a purely and strictly, and specifically recommendation, but it is part of the recommendation. Thank you.

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MANAL ISMAIL GAC CHAIR: Thank you, Iran. So, Brazil.

BRAZIL: Thank you, Madam Chair. Having heard a positive reply to our question, saying that indeed, suggestion or recommendation 4.3 is a recommendation that is subject to GAC approval, I would like to get a confirmation from the CCWG co-chairs of the following. In terms of procedure, the GAC now as one of the SOs and AC's has to examine and perhaps approve the recommendations.

The GAC will look into those recommendations 4.1, 4.2, 4.3 and decide whether or not it was in a position to approve them. In case the GAC is not in a position to approve the recommendations, the three of them, this decision or this failure of approving those recommendations shall be communicated to the CCWG in accordance with the CCWG charter rules.

In accordance with those rules as well, the communication shall be accompanied by the reasons for the failure of approval. Which means that the reasons that the objecting countries have will be made known to the CCWG. This is one aspect of the communication that will be sent to the CCWG informing of the approval or lack of approval of the recommendations.

But also, there's another aspect and I'm mentioning it separately here, but it is in the CCWG charter as a requirement. The communication to the CCWG by the GAC will therefore inform of the approval, the

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reasons for eventual lack of approval, and also it is open to the GAC to communicate an alternative that would make acceptable or approval of the recommendations possible.

The CCWG charter, therefore, allows the CCWG to, at its discretion, consider whether or not to amend in accordance with the suggestion made by the GAC, and also consider which process to follow. This may lead to a supplemental draft produced by the CCWG which would take into account the reasons for the objection of the GAC. And again, at the discretion of the CCWG, this supplemental draft may be either subject to another round of public comments and/or submitted again to the different SOs and ACs for approval.

So I've been stating what seems to me are the rules, facts basically, and the confirmation I would like to get is in accordance with the CCWG charter rules, what I've just mentioned as the process that seems to me to be the process that exists now is something that could be followed.

To conclude, an alternative that could be suggested, and I'm indicating this for your appreciation and your feedback, an alternative that could perhaps be acceptable or may make the recommendations as a whole acceptable to certain countries, would be, for example, a modification of language that would in effect that much the substance of recommendation 4.3 in which the word suggestion would be replaced by recommendation whenever those words appear. And I'm going to conclude. I just stand ready. If you want me to clarify further, just ask. Thank you very much.

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MANAL ISMAIL GAC CHAIR: Thank you very much, Brazil. So, yeah, please, Thomas. Go ahead.

THOMAS RICKERT: Yeah, this is Thomas Rickert, the GNSO appointed co-chair to the CCWG. And I should also say that Tijani Ben Jemaa sends his regards. He can't be with us today, but he would have loved to be here. Thanks very much for the comments that have been made. I am afraid we can only speak to the history of the genesis of our final report as well as to the procedural aspects as laid down in the charter. So I take this conversation that we're having not to be a formal notification to the chairs, at least for the time being, to take action. Just wanted to say that to the record.

We can only take action once we receive a formal notification, according to the charter. I think we are quite late in this process and certainly the valid points need to be made, and I guess that the concerns raised by several countries have been subject of debate in the CCWG for quite a bit, both in the subteam as well as in the plenary. And we were not able, as a group, to reach consensus on going any further than what you find in the language of our report. And this is exactly why the language in 4.3 is different on this point than it is for others.

You will remember that we had an extra session a couple of ICANN meetings back where we asked those who are not happy with the jurisdiction recommendations that were emerging, to present their



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points. And we actually made their positions part of our report in order to inform further discussions that can take place in the ICANN community. But there was no consensus for our group to actually make a recommendation that would make it a requirement for ICANN to take action on this and to initiate another discussion.

However, that does not preclude the GAC from requesting such discussion in other places. And there are fora that can be used for that. But it was just not possible to reach that consensus inside the CCWG. So that when we are discussing potentially kicking off the notification and asking for reconsideration of the report, we also need to take into account the discussions that took place and the potential chances of success to reach consensus on a modified version of the report.

Let me give you another example where the influence and the impact of the CCWG was limited. You might remember that we were discussing applicable laws for ICANN contracts? And it is not for the CCWG to directly impact or dictate what needs to go into the contracts between the contracted parties and ICANN. And therefore, we also had to frame our recommendations very carefully not to step over our mandate according to the charter, and just recommended that certain steps should be considered.

So in summary, I'm afraid that at this stage with four, probably soon to be five chartering organization that have accepted the report and its recommendation on an as-is basis, I think this is all the information that we can offer looking back on the deliberations that we had and also on the procedural aspects laid down in our charter.

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MANAL ISMAIL GAC CHAIR: Yes, please, Jordan. Go ahead.

JORDAN CARTER: Just to add one point as well. The charter, as you quoted correctly from Thiago, does mention that there is a discretion for the CCWG accountability. So in the hypothetical case that the GAC did decide to not, as a GAC, as an advisory committee not agree with the recommendation and send it back, there would be a discretion for the CCWG to deal with it.

CCWG operates by consensus. To reopen would require consensus to do so. So that would be based on the discussions that led to the final report and based on the fact that a number of other SOs and ACs have approved it. And I don't know that it seems very likely that there would be approval to reopen the question. It doesn't mean the procedure isn't available, I'm just hypothesizing about the possible outcome.

MANAL ISMAIL GAC CHAIR: Thank you, Jordan. I have Brazil and Iran. Brazil, please. And Switzerland. Okay, Brazil.

BRAZIL: Thank you very much, Manal. Thank you to the CCWG co-chairs. So just for the record, the answer to my question is yes, it is a possibility that the CCWG may, at its discretion, amend the recommendations if

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the GAC does not approve them and suggest an alternative. And yes, it is a possibility provided within the CCWG charter for the GAC to suggest the modification or a substitution of the word suggestion with the word recommendation whenever that word appears in the relevant passage.

So the answer is yes, it is within the discretion of the CCWG to do so and this is in accordance with the applicable rules as it is in accordance with the applicable rules for the GAC not to approve the recommendations and to suggest an alternative for the consideration of the CCWG chair. Thank you.

MANAL ISMAIL GAC CHAIR: Thank you, Brazil. Iran, please.

IRAN: Thank you, Manal. I think I have two separate courses of action. The first course of action before us is GAC react on this recommendations plus paragraph 4.3. What we conclude or will conclude that we send the CCWG. How we will be treated is up to CCWG. It's not up to us. We just make the proposals. This is point number one. We should not say, CCWG do this or to that. We submit our conclusion with the respect to this recommendation and communicate that to CCWG. We have considered the recommendation in total, two recommends plus paragraph 4.3, and this is our reaction. What CCWG will do with that depends on the CCWG activities chairs and so on.

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Now, comment to the proposal of Brazil to convert paragraph 4.3 as recommend. I don't see a major problem for that for the following reasons. Recommend and recommendations depends on the scope of recommendation to the wording and language of the recommendation. Sometimes recommendations recommend that action to be done. Sometimes recommendations recommend that this issues should be considered, is the other level of the applications. The language is different.

Once again, I'm sorry, in ITU we have many things. We have the following should be applied. The following should be used. The following should be considered. The following may be used. There is different language according to the different status of activity. We have to get out of this deadlock here. So we say that we could convert the paragraph 4.3 to recommend with the existing Board that we request consideration of that. What CCWG will do with that. that is up to CCWG and the co-chairs. They have to either, again, inform the community, to have a meeting, so on and so forth. We do not get into that. This is outside our mandate.

So we support the proposal of Brazil to convert the paragraph 4.3 to recommends with the existing Board calling on consideration of that. It is different on direct application, different from directly going to the course of action to consider this situation. Have I understood Brazil correctly? If not, Thiago, please correct me if I misunderstood you. Thank you.

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MANAL ISMAIL GAC CHAIR: Thank you very much, Iran. I have Switzerland and then Brazil. Switzerland, please.

SWITZERLAND: Thank you so much, Chair. I will try to be very brief. First of all, thank you for coming, Jordan and Thomas. Very much appreciated. A question of clarification. According to the procedures, the reconsideration by the CCWG would be triggered if one of the chartering organizations asks for that. Is that correct? So it means that this chartering organization, in this case, the GAC, according to its own procedures, in this case, consensus, asks the CCWG to do that. Is that correct?

MANAL ISMAIL GAC CHAIR: So, yeah, maybe we can take answers now before we move on so that we don't miss anything. So, Jordan, please.

JORDAN CARTER: So yes, that's correct.

MANAL ISMAIL GAC CHAIR: I have Brazil next.

BRAZIL: Thank you, Manal. I would like to add a few comments to what my colleague has just stated. And as this is my last ICANN meeting, I think I will allow myself the liberty to speak as transparently as I have been

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doing along the way, but to be very clear about the message we want to convey. For us, it's the bottom line that any modification that will be introduced as per the report, any adjustments that will be made should include the recognition, formally, the recognition that an issue remains regarding jurisdiction. It is not acceptable to us that we simply endorse the report and the recommendations.

There are recommendations, I would say, contained in the report that entail concrete action. And I think we heard from the co-chairs that recommendation 4.3 has a different nature because it does suggest that the issue be considered. It is not a hard recommendation that it should be or it should lead to concrete action. And I think it's fair to say that this represents the sentiment in the subgroup.

But in that case, if this is the understanding, that by accepting the report we are accepting those two hard recommendations and there is this third one that will probably not entail concrete action. It is not acceptable to us.

So what we could do, I see there are three alternatives. We could simply object and say there is no consensus in the line of our working procedures. It could not be said that the GAC has consensus to approve nor to reject. There would be no consensus position on this. And this will be addressed later on according to the rules. As the co-chairs have said, four of the charter organizations have approved. In the case of one, there will be a split decision and they will have to deal with this.

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Or the second alternative is the one we have been pursuing. And as my colleague explained, we have looked into the CCWG charter. We think that it is aligned with the CCWG charter to propose an alternative by indicating there is no consensus to propose an alternative that could be further looked into. And in the case CCWG could amend, there might be room for a consensus position. So I understand that the context. That was already explained by the co-chairs and we have been there in the subgroup, that although there is that potential possibility, excuse me for the redundancy, in reality maybe it's not feasible to request from the CCWG to amend the language that is already kind of balanced among its participants. But it would be an alternative that we have been pursuing so far.

And maybe there is a third way. That would be to address directly the Board. The CCWG report is there. We have to react. We have to provide advice. So it can be maybe directly addressed to the Board, the GAC, that we would support if all the colleagues could agree that the GAC could say there will be consensus within the GAC to approve provided that the three recommendations will be adopted. In case only two will be adopted, there is no consensus.

So I think the easiest way for us would be just to say no and to remain comfortable with these and see what happens later. We are trying to make a constructive proposal that CCWG could look into and provide an alternative. We understand the political context and the internal balance within CCWG may not allow it. And then there will be this third option in case it's not possible to address directly the Board.

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But in any case, I want to be clear that it's a bottom line for us. We cannot endorse a report that does not provide a way forward. And I want to be clear about that. We are not requesting that a solution be provided now. We are not requesting that together with the other hard recommendations we make a hard recommendation saying we are going to do this. We are just asking for the discussion to continue in a multistakeholder fashion. We think it's just fair. Because that issue, as I have said before, was there from day one of the first day of the first phase of the transition and it remains today.

So it's an issue that will not disappear. I think it's only fair that we recognize there was an issue and there is a path forward. That's what we are asking. Nothing more. We are not asking that the same level of decision will be made. But without that assurance, it's impossible for us to go along because we would be validating a new framework and possibly closing the file for years on the discussion with elements that are not acceptable for us. I would like colleagues to see it in that light. We are not requesting a final decision. We are requesting a path forward for discussion.

And those who are familiar with some discussions among countries, there are discussions that are there for decades. We are discussing the enlargement of the security council for years and there is not a viable solution in sight. But, for government, it's something that should be there. You cannot just say, let's complete anything and get away -- you cannot get away with something that is important for a number of countries.



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So this is, and again, there are three alternatives. We try to be constructive and provide a way forward in line with the CCWG charter. But maybe we should look into other ways of doing things. Thank you.

MANAL ISMAIL GAC CHAIR: Thank you very much, Brazil. So I understand you need to leave shortly? Yes, please go ahead, Thomas.

THOMAS RICKERT: Thanks very much, Chair. Thanks very much, Brazil. And before I make my substantial response to you let me confirm that Brazil has always been a very constructive partner in the CCWG and all this is documented. I would like to - I understand that you're trying to build bridges in order to find a solution for this. And what I would like to offer is how other chartering organizations have dealt with the approval of the outcome of our work. And so the GNSO made a resolution stating the GNSO council adopts the CCWG accountability works from two final reports and recommendations. So they tied it together.

So I think that for you the more important part is the substance of the report rather than the recommendations in isolation. And in our view, the substance of the jurisdiction subteam report is authoritative for the outcome of our work. So they linked the recommendations to the report and approved both in their resolution.

The ALAC stated on the 9th of November, 2018 the ALAC unanimously ratified the final report of the Cross Community Working Group

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Accountability WorkStream 2 with the following caveat to be addressed during the Board deliberations and the WorkStream 2 recommendations and ensuing implementation. So they added a comment to their approval. They stated that they see issues with resources and how the recommendations can be implemented. So it's a concern that they raised with this.

ASAK just responded, in response to your email of the 9th July 2018 in which you forwarded the final report of the Cross Community Working Group CCWG Accountability WorkStream 2 for approval by the chartering organization, the ASAC hereby provides that approval. So their language is also not limited to the recommendations as such. So this is just food for thought that you might find ways to link the recommendations to the substance of the report in the way you resolve over this.

MANAL ISMAIL GAC CHAIR: Thank you very much, Thomas. This is very helpful. So, any further questions or clarifications? Yes, Iran.

IRAN: Thank you, Thomas, for giving us an overview of what other constituencies or organizations made. For us, I don't think we can go to the resolution because it's time-consuming. The only thing with the comment on that. You, not suggested, mentioned that there are ways to comment on the report in total, not to this recommendation, specifically, if I am correct on this. Thank you.

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Then we just look at the report and we include any caveat that we would like to have in the report. So if that is the case, I could say we approve the report providing that paragraph 4.3 will be considered as a part of the recommendations. Thank you.

MANAL ISMAIL GAC CHAIR: Thank you, Iran. And so we are adopting or approving the whole report and not just two specific recommendations, right? So I can see U.K.

UNITED KINGDOM: Thank you, Chair. Just a question of clarification for my understanding of the procedures. As I understand it, the GAC would need to have consensus to support the report and we would need to have consensus to object to the report. Is there a third possibility of the GAC simply abstaining? And what would the consequences of that be if the GAC decided to abstain? Thank you.

MANAL ISMAIL GAC CHAIR: Thank you, U.K. Jordan, would you like to respond?

JORDAN CARTER: Thank you, U.K. for the question. I was looking back at the letter that the GAC transmitted in response to the WorkStream One recommendations in March 2016 that noted some overall support for some recommendations. It said that there's no consensus in the GAC and on Recommendation 11. And it concluded saying the GAC had no

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objection to the transmission of the proposal to the ICANN Board. And that was okay by means of the procedure. The charter does not require any of the supporting organizations or ACs that have chartered the group to approve or not approve. It doesn't say you have to make one choice or the other. So doing neither is absolutely an option for any SO or AC.

MANAL ISMAIL GAC CHAIR: Thank you Jordan. So, Brazil?

BRAZIL: Thank you, Madam Chair. I'm going to briefly react to the question raised by the representative from the U.K. Obviously, I'm not one of the co-chairs to the CCWG rules. But I have had a look at the charter, and according to the charter rules, the SOs and AC's are required or asked to approve the recommendations.

And this is what the GAC has been asked to do. Do we approve the recommendations? In which case, it is necessary that the GAC, by virtue of its internal rules, approve the recommendations which requires again consensus. And this is what we are asked to do. In case of non-approval, communication to the CCWG of the lack of approval with the reasons. Thank you.

THOMAS RICKERT: May I? Thanks, Brazil. Certainly, in an ideal world, the recommendations would be approved by all chartering organizations.

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So certainly, according to our charter, we reach out to all chartering organizations for their approval. However, for our report to be adopted and passed on to the Board, it is not necessary that all chartering organizations grant their approval. So I guess that probably clarifies things.

MANAL ISMAIL GAC CHAIR: Yes, please, Brazil. Go ahead.

BRAZIL: Thank you very much for the clarification, Thomas. I was not suggesting that the approval of each and every SO or AC is necessary for the recommendations to be transmitted to the Board. What I was trying to say here was in reaction to the U.K.'s question and the question was what the GAC is asked to do. And what the GAC has been asked to do is to approve or not the recommendations. Thank you.

MANAL ISMAIL GAC CHAIR: Thank you, Brazil. I think we are in a position to take an informed decision. So any further questions or clarifications before we thank co-chairs of WorkStream 2? Brazil, please.

BRAZIL: Thank you. I'm sorry, we've been speaking with two voices, but Thiago has been following this so closely and I think he's always very much updated on this. But one comment I would like to make, the difference between what we are doing now and what we have done in

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the first phase of the transition is that - and I recall what we did at that point in time. There was some differences among the GAC members in regard to aspects that were in the report, but there was clearly a way forward.

And one of the ways to address the differences among the GAC members, and other parts of the community but focusing on the GAC, was to launch the WorkStream 2. So when we made a decision to, in spite of some differences and lack of consensus in some recommendations, we decided to transmit and allow the process to go forward in the understanding that some issues of importance would be addressed in WorkStream 2.

So it was some kind of different situation than we are now in because now, in a way, it seems we are at the end of the road for some that want to close the files and close the discussion on all the topics that we address in WorkStream 2. And again I repeat, the only thing we are asking is that there is a recognition that in regard to jurisdiction there's still a need to pursue, to further look into issues that were addressed in WorkStream 2 and had been addressed also in WorkStream 1 in the first phase and could not be solved and then were deferred to WorkStream 2 and those things remain.

So just to say that the language we adopted in regard to the way we address the report of the first phase is different because the context was different. We had, at that point, a path forward in which we had the impression and the positive expectation that issues that, at that

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point, were controversial could be addressed in a satisfactory way.  
Thank you.

MANAL ISMAIL GAC CHAIR: Thank you, Brazil. Argentina.

ARGENTINA: Thank you, Manal. And thank you, Benedicto, for reminding us about that time. Just to remind the co-chairs that the minority statement was not only submitted by Brazil, but several countries. That you can check online. Thank you.

MANAL ISMAIL GAC CHAIR: Thank you very much, Argentina. Any other requests for the floor? Iran?

IRAN: Thank you, Manal. As our distinguished colleague, [inaudible] mentioned, there are several ways. Maybe the way that there was no consensus or no consensus was reached would be a reply to this CCWG with the reasons thereof. Another alternative, the same thing but adding a possible approach to address the issue. So the two ways with the first item that was proposed by Brazil. No consensus with reason thereof. And second, no consensus with reason but also proposing along the line of paragraph 4.3 the new course of action in order to address the shortcomings. Thank you.

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MANAL ISMAIL GAC CHAIR: Thank you, Iran. And, yeah, we will continue our discussion on this as we continue the drafting of the communique. But meanwhile, if there are not any concrete questions or clarifications from co-chairs of WorkStream 2, then maybe we can set you free now? Thank you again. Thank you very much, Thomas. Thank you, Jordan for making yourself available at the very short notice. Thank you.

So we are going to have a ten-minute break just to set the technical set up and get the document on the screen and see if there are any final submissions so that we can have the most updated version of the communique on the screen. So ten minutes. Please be back in time. Thank you. [AUDIO BREAK]

MANAL ISMAIL GAC CHAIR: So I can see that some discussions are going on which is perfect. And also there is a coffee break from 3:00 to 3:15. Then let's convene at 3:15. Thank you.

**[END OF TRANSCRIPTION]**