

Subject: Appeal against the consensus determination on proposal AFPUB-2019-V4-003-DRAFT04 (Resource Transfer Policy) <https://www.afrinic.net/policy/proposals/2019-v4-003-d4#revision-history>

a) Brief description of the topic under appeal

Dear Appeal Committee,

I'm appealing against the confirmation of consensus made by the PDWG co-chairs at the end of the last call on the 07th October 2020.

This as the result of the declaration of consensus made by the co-chairs during the open mic session of the AFRINIC-32 on-line meeting, on 17th September 2020 (<https://www.youtube.com/watch?v=F7EJploR38c&t=3h29m48s>), announced on the mailing list on 21st September with the beginning of the last call. (<https://lists.afrinic.net/pipermail/rpd/2020/011372.html>)

b) Date of the appeal

20th October 2020

c) Name and email address of complainant

Alain Patrick AINA: aalain at trstech.net

d) Names and email addresses of three (3) persons, other than the complainant, who support the appeal and who participated in the discussions

Marcus K. G. Adomey: madomey at hotmail.com

Vivien ASSANGBE WOTTO: vassangbewotto at benintelecoms.bj

Mirriam Lauren: mirriamlauren at yahoo.com

e) Date of the decision made by the Chair(s)

07th October 2020

f) Link to an announcement of the decision which is being appealed

<https://lists.afrinic.net/pipermail/rpd/2020/011630.html>

g) Evidence of a failed attempt to resolve the disagreement through discussion

Below are some evidences from the RPD list archive that many community members, including myself, attempted to engage with the co-chairs to clarify that many substantial objection, raised since the inception of the proposal up to AFRINIC-32 remain unaddressed and also that calling consensus on proposals provided that authors accept amendments imposed by co-chairs violated the PDP.

Furthermore it was pointed out to the co-chairs that the change made by the authors during the last call were not editorial changes and cannot be accepted as per the PDP.

The co-chairs have responded only with explanations of their own judgment of the fact and beliefs that they have complied with the PDP.

Considering the decision to confirm the consensus is still standing, the disagreement has not been resolved.

Community members

Fernando Frediani fhfrediani at gmail.com

Mon Sep 21 01:14:21 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011373.html>

Mon Sep 21 15:23:30 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011393.html>

Submission by Gregoire EHOUMI on behalf of the authors of the AFRINIC resource transfer policy proposal, including myself.

Mon Sep 21 16:30:38 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011396.html>

Fernando Frediani fhfrediani at gmail.com

Tue Sep 22 01:16:23 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011397.html>

Arnaud Amelina amelnaud at gmail.com

Tue Sep 22 06:26:41 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011400.html>

Marcus K. G. Adomey - madomey at hotmail.com

Wed Sep 23 13:21:02 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011431.html>

Alain Patrick AINA aalain at trstech.net

Wed Sep 23 16:38:37 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011436.html>

Mirriam mirriamlauren at yahoo.com

Thu Sep 24 10:12:12 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011448.html>

Noah noah at neo.co.tz

Fri Sep 25 09:27:48 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011456.html>

Darwin Costa dc at darwincosta.com

Fri Sep 25 11:53:43 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011460.html>

Marcus K. G. Adomey - madomey at hotmail.com

Tue Sep 29 08:33:15 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011526.html>

Arnaud Amelina amelnaud at gmail.com

Tue Oct 6 17:33:47 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011616.html>

Noah noah at neo.co.tz

Thu Oct 8 20:24:21 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011673.html>

Jordi Palet Martinez jordi.palet at consulintel.es

Thu Oct 8 07:42:51 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011634.html>

Sami Ait Ali Oulahcen sami at marwan.ma

Thu Oct 8 12:08:24 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011641.html>

Caleb Olumuyiwa Ogundele muiywacaleb at gmail.com

Thu Oct 8 13:12:59 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011645.html>

Alain Patrick AINA aalain at trstech.net

Thu Oct 8 12:31:49 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011642.html>

Alain Patrick AINA aalain at trstech.net

Fri Oct 9 04:44:30 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011689.html>

Frank Habicht geier at geier.ne.tz

Fri Oct 9 05:11:02 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011691.html>

Grégoire EHOUMI gregoire.ehoumi at yahoo.fr

Fri Oct 9 05:18:00 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011692.html>

Vivien ASSANGBE WOTTO vassangbewotto at benintelecoms.bj

Wed Oct 14 17:49:03 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011752.html>

Mirriam mirriamlauren at yahoo.com

Fri Oct 16 18:35:06 UTC 2020

<https://lists.afrinic.net/pipermail/rpd/2020/011761.html>

Co-chairs responses

<https://lists.afrinic.net/pipermail/rpd/2020/011415.html>

<https://lists.afrinic.net/pipermail/rpd/2020/011687.html>

<https://lists.afrinic.net/pipermail/rpd/2020/011688.html>

h) Detailed description of the grounds for appeal

My grievances against the decision made by the co-chairs are of several types:

- Non-compliance with the PDP concerning the administration of the working group
- Usurpation of prerogative
- Non-compliance with best practices relating to the management of working group documents
- Non-compliance with the principles that support the determination of consensus

Also, co-chairs have been biased and unfair by pushing forward a proposal with many specific issues among three (03) under discussion.

I will start with a brief history and presentation of the facts and demonstrate how co-chairs violated the PDP and working group best practices and so erred with their decision to confirm the consensus at the end of the last call.

The facts

Some history about the inter-RIR transfer policy

The first attempt to get inter-RIR transfer policy, traces back to 2015. The proposal gets withdrawn

<https://www.afrinic.net/library/policies/archive/withdrawn-proposals/1499-number-resources-transfer-policy>

This was followed by an initiative to have a transfer policy within the region which has been implemented and is in force

<https://afrinic.net/policy/archive/ipv4-resources-transfer-within-the-afrinic-region-2>

In 2018, another attempt to move forward with an inter-RIR transfer policy, also failed

<https://afrinic.net/policy/2018-gen-003-d1>

The author of the 2018 proposal came up with a new proposal called “IPv4 Inter-RIR Resource Transfers (Comprehensive Scope)” in 14 May 2019

The proposal aims to align AFRINIC with a market that already exists and in which AFRINIC is lagging behind, which is negative for the region.

<https://www.afrinic.net/policy/proposals/2019-v4-002-d1>

Along the discussion, a group of authors submitted a new inter-RIR transfer policy with a different problem statement, called “AFRINIC Number Resources Transfer Policy” in 29 August 2019.

The proposal aims to considering the limited IPv4 space initially made available to AFRINIC (AFRINIC manages only 7.23 /8s with a very low ratio of IPv4 addresses per Internet user), to allow for unused IPv4 from other regions to move into the AFRINIC service region – this without necessarily depleting AFRINIC's slim amount of IPv4 addresses by transferring space out of the region.

It allows transfer of IPv4 and ASNs resources. It restricts transfer of special-purpose resources (reserved resources for IXPs and DNS root ops, Last /8, etc.)

<https://www.afrinic.net/policy/proposals/2019-gen-002-d1#proposal>

Later on, another group of authors submitted a third policy proposal with another problem statement, called “Resource Transfer Policy (Draft-1)” in 30 October 2019

The proposal aims to establish an efficient and business-friendly mechanism to allow number resources to be transferred from/to other regions. This proposal outlines a model in which AFRINIC can freely transfer number resources to/from other regions, i.e. RIPE NCC, APNIC, ARIN and LACNIC. This includes both IPv4 addresses and AS numbers.

<https://www.afrinic.net/policy/proposals/2019-v4-003-d1>

Finding 1:

The working group ended up with three (03) totally incompatible inter-RIR policy proposals.

AFRINIC-31

The three (03) policy proposals were presented during Afrinic-31 in Luanda.

Based on some concerns and unaddressed objections cataloged in the minutes (<https://afrinic.net/ast/afrinic31-ppm-minutes-en.pdf>), none of the proposals reached rough consensus. The catalog of concerns raised per proposal gives a clear view of the perception and acceptance of each of the policies.

During the proceedings, and in violation of the PDP (co-chairs have no power to veto a proposal or decide which one goes forward), the co-chairs attempted to get Jordi to drop his proposal and support Taiwo/Anthony proposal and then asked Taiwo/Anthony to drop theirs to support Jordi and both groups refused. The co-chairs then suggested that the two (02) can work together.

The authors of the third policy proposal were excluded from this attempt (<https://youtu.be/DF0AFeaNiS0> section 3:07:30 3:11:00)

Finding 2:

The co-chairs deliberately decided to favour two (02) proposals against the third one even though the minutes clearly show that these two (02) policy proposals were found with more concerns and objections.

From AFRINIC-31 to AFRINIC-32

Between the two (02) public policy meetings, nothing was done by the co-chairs:

- To organize working group discussions towards addressing the issue of having three (03) different policy proposals for inter-RIR transfer policy discussion
- To organize working group discussions on addressing the numerous concerns and objections raised

The authors amended the proposal and submitted new versions as we got close to the public policy meeting:

On 12 August 2020 the version 4.0 of the policy proposal IPv4 Inter-RIR Resource Transfers (Comprehensive Scope) was submitted

<https://lists.afrinic.net/pipermail/rpd/2020/010946.html>

On 13 August 2020 the policy proposal Resource Transfer Policy (Draft-2), was submitted

<https://lists.afrinic.net/pipermail/rpd/2020/011025.html>

13 Aug 2020 Version 2: AFPUB-2019-V4-003-DRAFT02

The revision history of this version of the proposal indicates the following amendments.

- Section 5.7.3.1, 5.7.4.1 and 5.7.4.3 have been updated. Some of the amended sections were even more controversial. Some discussions were held on these controversial amendments. See thread <https://lists.afrinic.net/pipermail/rpd/2020/011025.html>

Curiously, section 5.7.5 which describes the transfer procedures, has been amended but not listed in the revision history. There were a significant changes to the role and responsibilities of the transferring RIR, which in the new version, no longer approves transfer request and just transfers the resources once notified by the receiving RIR (see below).

Version 1:

5.7.3.1 The source must be the current rightful holder of the IPv4 address resources registered with any RIR, and not be involved in any dispute as to the status of those resources.

Version 2:

5.7.3.1 The source must be the current rights holder of the IPv4 address resources registered with any RIR and shall be in compliance with the policies of the receiving RIR.

Version 1:

5.7.4.1 The transfer does not require approval from AFRINIC. It shall be approved as long as two (02) parties are on mutual agreement to transfer. This policy is based on no need basis. However, if a transfer happens between AFRINIC and a region where needs basis is imposed, a plan must be submitted to AFRINIC which includes a brief illustration of the use of 50% of the transferred resources in the coming 10 years.

To improve efficiency of transfer, the transfer request shall be standardized by the sender filling in a template.

Version 2:

5.7.4.1 A transfer from another RIR to AFRINIC requires a need-based evaluation. AFRINIC must approve the recipient's need for the IPv4 number resources. In order for an organization to qualify for receiving a transfer, it must first go through the process of justifying its IPv4 resource needs before AFRINIC. That is to say, the organization must justify and demonstrate before AFRINIC its initial/additional allocation/assignment usage, as applicable, according to the policies in force.

A transfer from AFRINIC to another RIR must follow the policy of the receiving RIR

Version 1: -NONE

Version 2:

5.7.4.3 Transferred IPv4 legacy resources will no longer be regarded as legacy resources.

Version 1:

5.7.5 Procedure of the resource transfer

5.7.5.1 The transferring party who holds the resources can initiate a transfer request between itself and an external party. If the two (02) parties agree, the transferring party will send a request to the RIR with which the resources are registered, using a standard template and submit an official agreement of resource transfer to the involved RIR(s). The transfer shall be in compliance with the policies of the transferring RIR.

5.7.5.2 After the transferring RIR has reviewed the application and deemed that it is appropriate to proceed with the transfer, it shall notify the receiving RIR, the transferring party and the recipient.

5.7.5.3 When the receiving RIR approves the transfer, the resources will be transferred to the recipient.

Version 2: (have been updated and not declared in the revision history)

5.7.5 Procedure of the resource transfer

5.7.5.1 The transferring party who holds the resources can initiate a transfer request between itself and an external party. If the two (02) parties agree, the transferring party will send a request to the receiving RIR, using a standard template and submit an official agreement of resource transfer to the involved RIR(s). The transfer shall be in compliance with the policies of the receiving RIR.

5.7.5.2 After the receiving RIR approves the transfer, it will notify the transferring RIR, the transferring party and the recipient. The resources will be transferred to the recipient.

5.7.5.3 When the receiving RIR approves the transfer, the resources will be transferred to the recipient.

Finding 3:

Co-chairs failed to lead the working group discussions toward adopting a consensual proposal from the three (03) different proposals under discussion and left it to the authors to select among the objections raised, those they addressed through the amended version of their proposal.

Due diligence was not done in asserting the integrity of amended document with some changes not being reflected in revision history.

During AFRINIC-32

As per the agenda, the three (03) policy proposals were presented, followed by staff impact assessment with very limited discussions due to time constraint.

Surprisingly, the co-chairs during the open mic, in the rendering on their decisions, declared that “AFRINIC Number Resources Transfer Policy” and “IPv4 Inter-RIR Resource Transfers Comprehensive Scope” did not reach consensus and that if the authors of the “Resource Transfer Policy Proposal”, accept to amend certain sections of their proposal, it will reach consensus and go into last call.

(<https://www.youtube.com/watch?v=F7EJploR38c&t=3h29m48s>)

Despite all the protests and calls to reconsider this decision, expressed even during the board open mic, the cochairs confirmed their decision on the mailing list on 21st September (<https://lists.afrinic.net/pipermail/rpd/2020/011372.html>).

They even overruled staff request to the working group to be allowed to request compatibility check with other RIRs. (None compatibility with ARIN was the main reason against the AFRINIC Number Resources Transfer Policy)

Finding 4:

With the three (03) proposals presented again during this meeting, many of the unaddressed objections and new ones raised during the little discussions allowed, were not addressed. The issues from the staff impact assessment were not considered and addressed.

By ignoring this situation and calling consensus on one proposal pending acceptance by the authors of co-chairs proposed amendments, the co-chairs usurped working group prerogative and erred with the rough consensus approach.

Also, they showed bias and unfairness regarding the two (02) other proposals, to the detriment of the working group and the community.

Post AFRINIC-32

In their message of 21st September, co-chairs started the last call on the policy proposals without specifying the duration of the last call and the draft policy document submitted to the last call; this in the clear violation of section 3.4.3 of the PDP.

Co-chairs in response to the several calls for them to reconsider their decision, did not deny the facts that many objections were not addressed and only claimed that they have come up with the best solution for the region based on openness, transparency and fairness, and have not broken any section of the CPM and rather upheld what the CPM. 3.2.3 of the CPM says:

“3.2.3 Fairness

The policies are to ensure fair distribution of resources and facilitating the operation of the Internet. Actions are taken within a reasonable period of time.

3.4.2 The Chair(s) determine(s) whether rough consensus has been achieved during the Public Policy Meeting”.

See thread <https://lists.afrinic.net/pipermail/rpd/2020/011415.html>

The authors submitted the version 3 of the policy proposal on the 23rd September, two (02) days later.

<https://lists.afrinic.net/pipermail/rpd/2020/011422.html>

The revision history indicates update of sections 5.7.3.2, and 5.7.4.3. The new versions read:

5.7.3.2 Source entities are not eligible to receive any further IPv4 allocations or assignments from AFRINIC for 12 months period after a transfer is approved.

5.7.4.3 Transferred legacy resources will still be regarded as legacy resources.

The co-chairs acknowledged receipt of the new version as below:

*"Dear Taiwo,
Thanks for sending the update. We shall go through it, check for reciprocity and let you know.
@ Madhivi, Please can you help check?
Thank
Co- Chair PDWG"*
<https://lists.afrinic.net/pipermail/rpd/2020/011423.html>

The version 3 of the proposal submitted for final review for a two (02) weeks last call generated long series of discussions with issues and objections. See thread
<https://lists.afrinic.net/pipermail/rpd/2020/011423.htm>

On the 4th of October, and in the middle of ongoing discussions on the version 3, the authors submitted a new version with the following introduction text:

*"Dear all,

We appreciate the concerns and points raised by the community. We have heard the statements and we have made adjustments accordingly to the proposal per the community's feedbacks.

Attached herewith is the newest and updated version of the proposal for the community's further discussion. We hope to have completely allayed the fears and concerns of the community with this version.

However, based on regulations, this is still subject to the co-chair's approval to be used as the final version to pass the last call.

Kind regards.

Taiwo"*
<https://lists.afrinic.net/pipermail/rpd/2020/011610.html>

The revision history indicates the following changes:

Date: 3 October, 2020

Section 5.7.3.1, 5.7.3.2, 5.7.4.1 and 5.7.5 have been updated.

- Section 5.7.5 has been completely removed and not updated

Changes to sections 5.7.3.1, 5.7.3.2, 5.7.4.1 are significant changes as they do impact the conditions on the source and impose some restrictions on transferred resources.

Three (03) days later, co-chairs ended the last call and declared and I quote that "based on feedback received from the community and the editorial changes made by authors to address community concerns, the consensus decision from AFRINIC-32 is still maintained".

<https://lists.afrinic.net/pipermail/rpd/2020/011630.html>

By doing so, co-chairs:

- Did not take into consideration the call for further discussions from the authors
- Did not wait for the staff feedback on their own request for reciprocity check with other RIR on which staff provided responses from ARIN and APNIC on the 9th October.

<https://lists.afrinic.net/pipermail/rpd/2020/011712.html>

The update from version 03 to version 04, clearly indicates that version 03, subject of the last call was found with many unaddressed objections and has failed the last call's review.

As stated above, the changes from version 03 to version 04 are not editorial changes and unclear what working group discussions triggered the changes.

The co-chairs failed to prove that the changes were editorial changes despite several enquiries to them in this regard. See thread <https://lists.afrinic.net/pipermail/rpd/2020/011630.html>

The PDP at section 3.4.3 (last call) did not have provision for changes in last call. Even though it is in accepted principle in working group procedures that editorial changes are allowed during last call, they are done through consensus.

Finding 5:

The co-chairs violated PDP provisions by starting a last call without submitting the document to be reviewed and the duration of the last call, but also accepting substantial changes as editorial changes to document in the last call. The co-chairs overruled staff requests to provide assessment report from other RIRs

Appreciation of the facts

Considering that PDP section 3.3. states "The Policy Development Working Group has two (02) Chairs to perform its administrative functions". This means the management of the PDWG, the PPM, the RPD list and determine consensus,

Considering that PDP sections 3.4.2. states "The Chair(s) determine(s) whether rough consensus has been achieved during the Public Policy Meeting",

Considering that PDP section 3.4.2 states Public Policy Meeting

The draft policy is placed on the agenda of an open public policy meeting. The agenda of the meeting shall be announced on the Resource Policy Discussion mailing list at least two (02) weeks prior to the meeting. No change can be made to a draft policy within one week of the meeting. This is so that a stable version of the draft policy can be considered at the meeting. The Chair(s) determine(s) whether rough consensus has been achieved during the Public Policy Meeting,

The PDP gives no right or authority and does not allow co-chairs to determine consensus by imposing or even proposing changes to proposal text as conditions to reach consensus and be move to the "Last Call". Personal changes suggestions from co-chairs shall be done with co-chairs hat-off. Only working group accepted changes are allowed. [Finding 4]

Furthermore,

Considering that according to RFC 7282, the rough consensus that is globally accepted within the RIR community is the path and not the destination and is defined by a lack of objections that are sustained and unaddressed, by the prevalence of lack of disagreement over agreement in the consensus process.

Considering that RFC 7282, in section 5 (consensus is the path not the destination) indicates that the important thing for a chair to do is to "call consensus" in the sense of declaring the consensus; others can always object and say that the chair has gotten the consensus wrong and ask for reconsideration. However, the chair ought to be looking for consensus throughout the discussion, not asking for it at the end,

The authors or co-chairs do not have the right or authority to choose which objections are valid and invalid and then use that as a basis for choosing which ones they will respond to and address – ALL objections must be addressed. [Finding 3]

Co-chairs should have made sure that all sustained objection are addressed throughout some discussions, clear as much as possible the disagreements and look for the consensus over this discussions, instead declaring the consensus as they did during AFRINIC-32. [Finding 4]

Therefore, the determination of the consensus by co-chairs, on the “Resource Transfer Policy” version 2.0 at AFRINIC-32 violated the PDP.

During the last call,

Considering that PDP section 3.4.3 states a final review of the draft policy is initiated by the Working Group Chair(s) by sending an announcement to the Resource Policy Discussion mailing list. The Last Call period shall be at least two (02) weeks. The Working Group Chair(s) shall evaluate the feedback received during the Public Policy Meeting and during this period and decide whether consensus has been achieved,

Considering that section 8 states (Review of documents of RFC 2418)It is important to note that a Last-Call is intended as a brief, final check with the Internet community, to make sure that no important concerns have been missed or misunderstood. The Last-Call should not serve as a more general, in-depth review.....

Changes and especially substantial changes or general in-depth review of proposal in last call are not allowed. [Finding 5]

Furthermore,

Considering that co-chairs failed to prove that the changes on the proposal from version 03 to version 04 were editorial changes

Therefore, the confirmation of the consensus by co-chairs, at the end of the last call on version 04 of the proposal also violated the PDP.

Specific issues regarding the proposal being appealed

Since its inception and throughout the discussion, many important concerns and objections were raised.

The problem being addressed by the proposal has never been accepted and so is the proposed solution.

“Summary of the problem being addressed by this proposal

The current policy fails to support a two-way Inter-RIR policy, there by hindering smooth business operation, development and growth in the region. This proposal aims to establish an efficient and business-friendly mechanism to allow number resources to be transferred from/to other regions. This proposal outlines a model in which AFRINIC can freely transfer number resources to/from other regions, i.e. RIPE NCC, APNIC, ARIN and LACNIC. This includes both IPv4 addresses and AS numbers”.

The various AFRINIC impact assessments also point out many of the irrationalities and the implementation challenges this proposal posed.

The revision log of the proposal from version 01 to version 04 speaks for itself. The various amendments proposed were trying to develop a regulated transfer policy from the initial idea of the free market transfer policy.

Furthermore, this proposal has among other issues the following:

- It denies AFRINIC the right to approve outgoing transfers by not explicitly imposing this and also making the agreement between the transferring and receiving parties to prevail. This is an unwanted scenario as AFRINIC must remain in control of resources and determine which members and resources are eligible for transfer
- It allows all allocations /assignments from AFRINIC pool including the last /8 (102/8) and critical infrastructure to be transferred. These resources are for special purposes and should not be transferred and remain in the AFRINIC pool. Others RIRs have the same restrictions or allow their transfer after a certain amount of time
- It allows legacy to remain legacy after transferred in. This goes against the provision in the current intra RIR policy. Resources transferred through intra RIR transfer policy should be subject to regional policies and so cannot remain legacy. Furthermore, this provision is not in the interest of AFRINIC service region
- It does not enforce receiver of transfer to be members and resources to be subjected to policy. By not explicitly requesting this, it creates a loophole which indicates that resources may be registered in the database without members signing RSA and resources being subject to local policies
- It does not allow transfer of ASNs even though it was demonstrated that there were cases where transfer of ASNs is desirable within region and outside region. All other RIR also allow transfer of ASNs.

In conclusion,

On the basis of the elements presented above, and inline with previous ruling in case of appeal against declared consensus of AFPUB-2016-V4-001-DRAFT07, we respectfully ask the appeal committee:

- 1. To annul the co-chairs decisions announced on the 7th of October at the conclusion of the last call**
- 2. To declare that the co-chairs in making the contested decision have been biased and unfair to the other two (02) proposals, preventing the working group from making the best effort to get a consensual proposal.**

i) A list of additional material that the complainant will rely on, if any