

<p style="text-align: right;">Pages 262 - 409 262</p> <p style="text-align: center;">INTERNATIONAL CENTRE FOR SETTLEMENT OF INVESTMENT DISPUTES</p> <p style="text-align: center;">ICSID Case No ARB/20/7 between</p> <hr/> <p style="text-align: center;">Security Services LLC d/b/a Neustar Security Services (formerly Neustar, Inc) Claimant</p> <p style="text-align: center;">- v -</p> <p style="text-align: center;">Republic of Colombia Respondent</p> <hr/> <p style="text-align: center;">The Arbitral Tribunal Professor Julian DM Lew KC - President Professor Yves Derains - Arbitrator Professor Kaj Hobér - Arbitrator</p> <hr/> <p style="text-align: center;">ORAL HEARING Tuesday, 28 March 2023</p> <hr/>	<p style="text-align: right;">263</p> <p style="text-align: center;">LIST OF PARTICIPANTS</p> <p>The Tribunal: The President: PROFESSOR JULIAN DM LEW KC</p> <p>Co-Arbitrators: PROFESSOR YVES DERAINS PROFESSOR KAJ HOBÉR</p> <p>ICSID Secretariat: MS VERONICA LAVISTA, Secretary of the Tribunal</p>
<p style="text-align: right;">264</p> <p style="text-align: center;">LIST OF PARTICIPANTS</p> <p>On behalf of Claimant:</p> <p>In person:</p> <p>Counsel:</p> <p>Client representative:</p> <p>MR KEVIN HUGHES Step toe & Johnson LLP:</p> <p>MR TEDDY BALDWIN MR THOMAS TINES (UK Office) MS CHLOE BALDWIN MS LINDSEY DIMOND (UK Office)</p>	<p style="text-align: right;">265</p> <p style="text-align: center;">LIST OF PARTICIPANTS</p> <p>On behalf of Respondent:</p> <p>In person:</p> <p>Counsel:</p> <p>Agencia Nacional de Defensa Juridica del Estado:</p> <p>MS ANA MARIA ORDOÑEZ PUENTES MR CAMILO VALDIMESO LEÓN</p> <p>Remote:</p> <p>MS MARTHA LUCIA ZAMORA ÁVILA MS ELIZABETH PRADO MS JULIANA DE VALDENERRO MR GIOVANNY ANDRÉS VEGA BARBOSA MS MARCELA MARIA SILVA ZAMBRANO</p> <p>In Person:</p> <p>Hogan Lovells:</p> <p>MR LAURENT GOUFFÈS MR DANIEL E GONZALEZ MS MELISSA ORDONEZ MR LUCAS AUBRY</p> <p>Witnesses:</p> <p>MS SYLVIA CRISTINA CONSTAÍN RENGIFO MS LUISA FERNANDA TRUJILLO BERNAL MR IVÁN DARIO CASTAÑO PEREZ</p>

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1 (9.31 am, Tuesday, 28 March 2023) 268
 2 IVÁN DARÍO CASTAÑO, continued
 3 (with the assistance of the Interpreters)
 4 **PRESIDENT:** Good morning, ladies and
 5 gentlemen. Today is the 28 March. We are here for
 6 the second day in our hearing of Security Services
 7 LLC against the Republic of Colombia.
 8 Can I thank the transcript writers. We
 9 have received the transcript, both in Spanish and in
 10 English.
 11 Before we continue with Mr Castaño's
 12 examination are there any issues that either side
 13 wishes to raise. From Claimant's side?
 14 **MR BALDWIN:** Yes, we do, Mr President. We
 15 received an email last night from Respondent's
 16 counsel and we wanted to address it this morning
 17 before the Tribunal, before we begin the continued
 18 examination of Mr Castaño.
 19 **PRESIDENT:** Is it an issue that Mr Castaño
 20 needs to be here for?
 21 **MR BALDWIN:** No, it is not an issue that
 22 he needs to be here for.
 23 **PRESIDENT:** Is it worth finishing his
 24 examination and then dealing with whatever the other
 25 issue is?

1 **MR BALDWIN:** We can do that. It doesn't 269
 2 have to occur before his examination, so ... 09:33
 3 **PRESIDENT:** Well, this issue that you are
 4 going to raise, did we get a copy of that – you say
 5 you had correspondence from Respondent's counsel?
 6 **MR BALDWIN:** We received an email. We
 7 were going to put it up on the screen to show you
 8 and then discuss it, but it was an email that
 9 counsel sent, that Laurent sent to us
 10 **PRESIDENT:** Then can I suggest we finish
 11 this witness and after that we will take this issue
 12 that you want to raise.
 13 **MR BALDWIN:** Okay.
 14 **PRESIDENT:** Mr Gouiffès, is there anything
 15 from your end that you wish to raise?
 16 **MR GOUIFFÈS:** We had a few points but we
 17 will follow your suggestion – after this witness,
 18 perfect, Mr Chairman.
 19 **PRESIDENT:** Good morning, Mr Castaño
 20 **MR CASTAÑO:** Good morning, sir.
 21 **PRESIDENT:** I hope that your evening in
 22 purdah still enabled you to have a relaxing evening.
 23 We will continue your evidence, and we expect that
 24 your oath that you gave yesterday remains in place.
 25 Mr Baldwin, please continue.

1 **Cross-examination by Claimant, cont'd** 270
09:34
 2 by Mr Baldwin, cont'd
 3 **MR BALDWIN:** Good morning, Mr Castaño.
 4 Just to confirm you didn't have any conversations
 5 with anyone last night or yesterday evening about
 6 your testimony yesterday or this morning, correct?
 7 **MR CASTAÑO:** That is correct.
 8 **MR BALDWIN:** Hopefully it was a peaceful
 9 evening then without having to spend a lot of time
 10 discussing things.
 11 Yesterday we talked a little bit about
 12 ICANN, and how— well, let's put up what you said.
 13 We are going to put up something you said yesterday
 14 on your screen regarding ICANN.
 15 You can see I asked you: "What did you do
 16 to change that in the year you were there?" And
 17 then you mentioned several things and we will go
 18 down to the ICANN. You said: "Among them we hired
 19 more staff", and then it said, "Even if on the one
 20 hand we had to supervise the domain .CO we also had
 21 to participate in ICANN events. I don't know how
 22 that was done by the previous administration but
 23 I decided to personally attend ICANN events, so
 24 I had the opportunity to be there."
 25 **MR GONZALEZ:** Sorry counsel, but if you

1 are going to be referring to his transcript, I would 271
09:36
 2 ask that you give him a full copy of the transcript
 3 so that he can look at the full context so whatever
 4 he has testified to you are quoting from his actual
 5 testimony.
 6 **MR BALDWIN:** Let me ask you a question,
 7 Mr Castaño. Do you understand it to mean that—
 8 Is there anything in the concession that
 9 prevented anyone from MinTIC supervising the
 10 agreement or otherwise from participating in ICANN
 11 events?
 12 **MR CASTAÑO:** From participating in ICANN
 13 events, no. However— however— the official
 14 representation of Colombia before ICANN was in
 15 charge of the concessionaire and not of Colombia's
 16 government.
 17 **MR BALDWIN:** Is there anything that you
 18 are aware of in the concession agreement that states
 19 that the government can't participate in ICANN
 20 events or ICANN discussions? Is there anything in
 21 the concession that forbids that? And I am talking
 22 about the 2009 concession, the one you were
 23 supervising.
 24 **MR CASTAÑO:** Not that I recall, no.
 25 **MR BALDWIN:** So the decision not to

1 participate was not because there was a restriction 272
09:37
 2 on doing so by Colombia, right?
 3 **MR CASTAÑO:** Yes. That is correct.
 4 **MR BALDWIN:** Thank you. Now yesterday you
 5 also said, if we could just go to this on the
 6 screen—
 7 **PRESIDENT:** Do you have a hard copy?
 8 **MR BALDWIN:** We don't, but I can do it
 9 however you would like. I am not asking him a
 10 question from the transcript: I am giving him
 11 background that he can see.
 12 **MR GONZÁLEZ:** No, you are quoting directly
 13 from the transcript and he is entitled to see
 14 exactly what you are seeing. We are providing him a
 15 copy, Mr Chairman.
 16 **PRESIDENT:** Very good. Thank you. (Same
 17 handed)
 18 **MR BALDWIN:** So if we could look at
 19 page 226, Mr Castaño, and then line 11. Are you
 20 looking at the English version?
 21 **MR CASTAÑO:** Yes, sir.
 22 **MR BALDWIN:** So if you look at 226, line
 23 11, and it says here, just read it so it is in the
 24 record— you can read it to yourself obviously but
 25 I am going to read it so we have it in the

1 transcript. You state: 273
09:39
 2 "I think that one of the, let's say,
 3 issues was the dependence, the reliance on the
 4 information provided by .CO Internet. We were paid
 5 7 per cent, 7 per cent of the sales, of the
 6 proceeds, so we did not have an information source.
 7 We could not compare."
 8 Do you see that?
 9 **MR CASTAÑO:** Yes, I do see that
 10 **MR BALDWIN:** And actually I should have
 11 read the next three sentences as well. It says:
 12 "We could not know if the numbers sold
 13 registries were those that were reported by .CO
 14 Internet. Or maybe it was different. We could not
 15 check that".
 16 Do you see that?
 17 **MR CASTAÑO:** I do see that.
 18 **MR BALDWIN:** What in the concession
 19 agreement prevented you from checking that? You
 20 said you couldn't check it. "We could not check
 21 that", you say. What is it in the 2009 concession
 22 that prevented you from checking it?
 23 **MR CASTAÑO:** Excuse me, I am trying to
 24 understand, because I was answering a question so
 25 I'm trying to see what was the background, what was

1 the question I was answering at that point. I was ²⁷⁴
2 replying to a particular question so I am trying to _{09:40}
3 understand what was the question
4 **MR BALDWIN:** Please, take as much time as
5 you need to read back and understand it. (Pause)
6 **MR CASTAÑO:** Well, so prior to that
7 question we were talking about paragraph 7 of my
8 witness statement, and on that basis I was answering
9 to the following question, and you have read the
10 reply to that question. And we were discussing
11 issues related to the reliance we had. We were
12 relying on the information that was received from
13 .CO Internet SAS, and that was in order to reply to
14 your question, and to reply to it directly there was
15 no prohibition.
16 However, we didn't have any other
17 alternative information sources that could have
18 allowed us to compare. For instance, let's say that
19 .CO Internet did not mention that they were
20 developing a marketing project with an investment of
21 X amount of dollars, we could not know if the
22 investment was of that amount or of a different
23 amount. We were in good faith, and we relied on
24 their good faith and on the fact that the
25 information was correct. We didn't have another

1 you look in the last week or so at the 2009 ²⁷⁶
2 concession? _{09:45}
3 **MR GONZÁLEZ:** Objection. That calls for
4 privileged communication. That is work product in
5 terms of what documents we did or did not show him.
6 **PRESIDENT:** I would like to stop the
7 interruptions. We are not in a court. We are in an
8 arbitration. Let's just proceed, and I would also
9 like to see if you can keep these questions directly
10 as questions rather than as a discussion. Put the
11 questions to the witness and let's see if we can
12 move this a little bit faster.
13 **MR GONZÁLEZ:** Yes. And we will take your
14 caution, Mr Chairman. Just only on privilege issues
15 we must sort of insist.
16 **MR BALDWIN:** Have you seen the 2009
17 concession recently? In the last month?
18 **MR CASTAÑO:** Yes, sir.
19 **MR BALDWIN:** And from your time, your
20 year, supervising the contract, do you recall
21 whether or not that concession gave you audit
22 rights?
23 **MR GONZÁLEZ:** I am sorry, Mr Chairman, you
24 just asked counsel to ask direct questions. The
25 witness already asked to be shown the document. He

1 source of information. ²⁷⁵
2 In the same way, we assumed in good faith _{09:43}
3 that the value for which the number of domains
4 reported during the month of execution of the
5 contract had been sold was the value effectively
6 received by .CO Internet SAS and we received
7 7 per cent of the amount.
8 **MR BALDWIN:** Okay. So is there
9 anything -- can you point to me in the 2009
10 concession --
11 First, I will ask if you recall and then
12 we can look at the concession directly, but you were
13 responsible for a year for supervising this 2009
14 concession, so let me ask, do you believe there was
15 something in the 2009 concession that prevented you
16 from being able to look at documents or to audit
17 what the information that .CO Internet was giving
18 you?
19 **MR CASTAÑO:** Could we see the document,
20 please?
21 **MR BALDWIN:** You can, but I'm asking you
22 because for a year you supervised it, and you have
23 testified to it again today.
24 Let me ask you this. In preparation for
25 your testimony yesterday, starting yesterday, did

1 is trying to test his memory on a document that is ²⁷⁷
2 at issue in this case, the contract. He is entitled _{09:46}
3 to see it and he has asked for it. I have to
4 interrupt on that.
5 **PRESIDENT:** Do you have a memory on that
6 particular point?
7 **MR CASTAÑO:** Well, I think it is quite a
8 long document. There are annexes, so I would
9 rather see it. I don't remember everything by
10 memory, no.
11 **MR BALDWIN:** Okay. We will move this
12 along, Mr Castaño. It doesn't appear you know -- if
13 you could look at C-17 in your bundle?
14 **PRESIDENT:** Mr Baldwin, I am reluctant to
15 interrupt, but if there is something in that
16 document that is relevant and you wish to present
17 that and discuss how that was applied to the
18 witness, that is one issue. If there is something
19 in the document that you feel is relevant, it will
20 be handled in submissions to the Tribunal.
21 So let's try -- I am not quite sure where
22 you are going on memory. If it is specifically how
23 a particular issue was dealt with, let's have the
24 question which is clear which he can answer as best
25 he can or he will say he doesn't know the answer or

1 he doesn't remember. Let's try and move it in that ²⁷⁸
2 direction. _{09:47}
3 **MR BALDWIN:** Okay. I just asked him to
4 look at C-17 in his bundle, please. It is tab No 1
5 in your bundle.
6 **Mr Castaño,** could you go to section9,
7 please? That is the ninth section of this. Why
8 don't you read section 9, please?
9 **PRESIDENT:** What page are you on?
10 **MR BALDWIN:** It is the ninth – I don't
11 have the PDF –
12 **PRESIDENT:** We are looking at the Spanish
13 version and at the bottom of the page it has
14 numbers. I am looking at 6 of 11.
15 **MR BALDWIN:** 3 of 11.
16 **MR CASTAÑO:** Ninth Registry on reports of
17 the concessionaire. The concessionaire shall submit
18 the report that the other party requires as well as
19 the following reports. No 1. Monthly report
20 concerning the progress of the plans defined in the
21 proposal. Second, monthly report with the
22 performance of the management indicators vis-à-vis
23 the targets that were agreed. And, third, the
24 monthly report on the transactions that are broken
25 down as follows: A. New registries, transfers,

1 suspensions, cancellations and changes among other ²⁷⁹
2 B. Accredited registrars; _{09:50}
3 C. Other statistics that had been
4 suggested by the concessionaire or previously agreed
5 with the other party.
6 Fourth. A monthly report on the proceeds.
7 Fifth. A monthly report of the
8 performance of the registrars.
9 No 6. Annual report with the management
10 of all the period, including information on the
11 reliability of the data contained in the WHOIS.
12 No 7. Periodic reports on the audits
13 realised and the final report that shall be
14 submitted 180 days before the end of the contract
15 with information that may be useful for the new
16 selection process in order to administer the
17 ccTLD.co.
18 **MR BALDWIN:** Do you recall whether .CO
19 Internet submitted those reports?
20 **MR CASTAÑO:** No 8. A final report that
21 should be submitted 180 days – well, in the time
22 when I was working there, that one had not been
23 submitted by the operator .CO Internet SAS in a
24 satisfactory manner, and we were ready, or let's say
25 we were waiting for that. Maybe some legal action

1 was to be initiated because that final report had ²⁸⁰
2 not been satisfactorily submitted. _{09:52}
3 **MR BALDWIN:** Did you initiate any legal
4 action?
5 **MR CASTAÑO:** No. Because I quit that
6 function on 26 August.
7 **MR BALDWIN:** Can we turn to the 16th
8 section, which would be it starts on page 6 of 11,
9 at the bottom of page 6 of 11. I don't need you to
10 read it out loud but we can all read it. If you
11 would like to take a moment, read that entire
12 section 16th, please. (Pause)
13 Just let me know when you are done.
14 **MR CASTAÑO:** Yes.
15 **MR BALDWIN:** So my question for you in
16 light of that provision, when .CO Internet in the
17 year you were supervising the contract, did you use
18 this section, the 16th section, did you use the 16th
19 section to supervise the contract and request
20 additional information to verify what .CO Internet
21 was giving you?
22 **MR CASTAÑO:** Regarding that clause, this
23 is linked to the physical infrastructure which is
24 the basis of all the domain registry system, and
25 what we did during that year, when I was the

1 director of industrial development, was that one of ²⁸¹
2 the supervisors of the contract travelled physically _{09:55}
3 to the premises, to the data centre of Neustar, in
4 the US, so he went there physically and he did all
5 the technical inspections that were required by the
6 contract. That is the way we performed that role
7 that is explained in section 16, specifically with
8 regard to inspections to the infrastructure that
9 were necessary for the performance of the contract
10 obligations in order to verify the premises, the
11 facilities of Neustar in the US as well as some
12 premises in Colombia.
13 **MR BALDWIN:** If you could open up your
14 witness statement, paragraph 13, and read that for a
15 moment, please.
16 **MR CASTAÑO:** Which paragraph, please?
17 **MR BALDWIN:** Paragraph 13 of your witness
18 statement, please. (Pause)
19 You say: "During this session, we focused
20 on analysing in greater detail the report which had
21 been prepared by the earlier administration
22 regarding the administration of the .co domain and
23 observed that while this report contained
24 interesting insights, it was not sufficient for
25 Colombia to assess the opportunity of either

1 renewing the 2009 Contract or initiating a new ²⁸²
2 tender process". _{09:58}

3 Then you say, and this is the part I want
4 to focus on: "In particular, regarding the
5 .co domain operation model, we found that this
6 report 'did not take into consideration the absence
7 of a clear and specific public policy on this topic,
8 different from the exclusive outsourcing for
9 operation and administration'."

10 Then you say: "an issue that it was
11 necessary to tackle in light of the evolutions of
12 the domain name industry that I describe above".

13 Did you feel that that July 2018 report
14 was deficient?

15 **MR CASTAÑO:** In which way?

16 **MR BALDWIN:** In the way you describe here.
17 What did you find deficient about the July 2018
18 report, if you did find something deficient?

19 **MR CASTAÑO:** I think there are two
20 questions in your question. The first one was if
21 I considered that that was deficient, and the second
22 question what was deficient in the report. Am
23 I correct in my understanding?

24 **MR BALDWIN:** Yes.

25 **MR CASTAÑO:** The July 2018 report in my

1 view was not a deficient report, and that is what ²⁸³
2 I always said when I was asked about that report. _{09:59}
3 It was a preliminary report that had been prepared
4 by the earlier administration concerning mainly the
5 transition period. There was to be a new president,
6 so that report introduces some scenarios that have
7 to be considered by the new government, the new
8 administration, but that report was not intended to
9 either initiate a new selection process or to
10 initiate a process of extension of the 2009
11 Contract. So I don't think it was a deficient
12 report but the aim was not the same. The aim was
13 information about the context, about the situation
14 that was unfolding in the government, it was
15 important for the Ministry's new team to take all
16 that into account. That was important.

17 **MR BALDWIN:** And it was your opinion that
18 one of the things that needed to change was this
19 exclusive outsourcing model, as you see in that
20 paragraph 13?

21 **MR CASTAÑO:** Well, in December 2018 yes.
22 The document of June 2018 is not binding and it is
23 not a recommendation of a change of the model, of
24 the exclusive outsourcing model, but in December,
25 by December 2018, after some work, after some

1 months' work, and even some studies, some analyses ²⁸⁴
2 of other issues, it was more and more clear that it _{10:01}
3 was necessary for Colombia, as a sovereign country,
4 it was necessary to have a national policy for the
5 management of that resource, and that policy should
6 have been a lot more proactive and more direct
7 concerning state management of the resource. And
8 that of course included the modification of that
9 model of the exclusive outsourcing of the
10 administration and management of the domain.

11 **MR BALDWIN:** And turn to paragraph 15. We
12 are getting close to the end, Mr Castaño, just to
13 let you know, but turn to paragraph 15 for a moment
14 of your witness statement.

15 **MR CASTAÑO:** Yes.

16 **MR BALDWIN:** And it says here, and if you
17 need to read the paragraph or paragraphs above,
18 please do, but it says here:

19 "However, at this moment we still did not
20 discard entirely the possibility of a renewal of the
21 2009 Contract."

22 What is "at this moment"? Which moment
23 are you describing with that?

24 **MR CASTAÑO:** Well, that specific moment to
25 which I am referring in paragraph 15 was the end of

1 2018, but that same situation remained until ²⁸⁵
2 mid-March, 18 March 2019 more specifically, which _{10:03}
3 was the moment when the decision was in fact taken
4 to move forward with a new bidding process in light
5 of studies, the analyses that we had received.

6 Moreover, during the advisory committee
7 session during which the decision was taken we also
8 looked at the advantages that a possible extension
9 might provide, but in paragraph 15 I am specifically
10 referring there to the month of December 2018.

11 **MR BALDWIN:** And was that – was "at this
12 moment" December 2018, was it after the advisory
13 board meeting in December 2018, or before it, or at
14 the board meeting? You say it was December. I am
15 just trying to understand whether it was before or
16 after that meeting.

17 **MR CASTAÑO:** It was in December, but as
18 I mentioned before, the idea of continuing with an
19 extension in January/February 2019 was something we
20 were still looking at. We continued to look at both
21 options until such time as in March 2019, on 18 or
22 19 of March at that committee meeting, the decision
23 was finally made to move forward with the bidding
24 process.

25 **MR BALDWIN:** If I missed it, I apologise,

1 but just to ask this, the "at this moment" you ²⁸⁶
2 referred to in paragraph 15. You said it _{10:06}
3 was December.

4 **MR CASTAÑO:** Yes. That is
5 correct, December.

6 **MR BALDWIN:** Was it in December before
7 that advisory board meeting on December 18 or 10th
8 or after?

9 **MR CASTAÑO:** Well, we could in actual fact
10 say during and after the meeting of the advisory
11 committee board.

12 **MR BALDWIN:** Just one moment, please.

13 Mr President, could we just have 30
14 seconds?

15 **PRESIDENT:** Yes.

16 (Pause)

17 **MR BALDWIN:** Could you turn to
18 paragraph 27 of your statement?

19 **MR CASTAÑO:** Yes, thank you. I have
20 finished.

21 **MR BALDWIN:** In there you refer to .CO's
22 offer of an anticipated payment and you have used
23 the word "we". You use the word "we" a lot in your
24 statement. I want to understand whose
25 responsibility was it to evaluate and decide on the

1 offer that .CO Internet, which you call the ²⁸⁷
2 unilateral offer that .CO Internet made on _{10:08}
3 21 May 2019, who was to decide whether or not to
4 accept that offer?

5 **MR CASTAÑO:** If you would just allow me,
6 I just need to find the point in that paragraph
7 where I say "we" so that I can give you a proper
8 response to the question. Where are you referring
9 to exactly in that paragraph?

10 **PRESIDENT:** "We". Second last line.

11 **MR CASTAÑO:** The thing is I am reading the
12 version in Spanish, so I am just trying to find the
13 word in Spanish in the paragraph.

14 **MR BALDWIN:** If you can just read the last
15 sentence of that -- actually, let me just strike
16 that question.

17 Let me just ask this. Who was responsible
18 for evaluating this offer of 21 May 2019? Who was
19 responsible for evaluating that offer?

20 **MR CASTAÑO:** The person who was
21 responsible for evaluating the offer, and this is
22 the May offer, if you allow me just one second,
23 please. (Pause)

24 May 2019 we are referring to. So the
25 persons responsible for evaluating the offer would

1 be those responsible for IT industry development as ²⁸⁸
2 supervisors of the contract, which a request for an _{10:10}
3 extension referred to, so that would be part of the
4 legal department and the general secretariat's
5 responsibility in terms of compliance with the legal
6 requirements in place to make sure that everything
7 was being done according to the Colombian rules and
8 regulations and law

9 **MR BALDWIN:** I just want to understand,
10 because this is a point I think that is important.
11 Are you saying it is the General Secretariat's role
12 to decide whether to accept or to evaluate the offer
13 and then perhaps accept the offer?

14 **MR CASTAÑO:** From a legal point of view
15 the Secretary General and the legal advisory agency
16 of the Ministry has that responsibility. That is to
17 say, from a legal standpoint that's their function.

18 **MR BALDWIN:** What about from the business
19 standpoint, or the standpoint of the government?

20 **MR CASTAÑO:** Well, in terms of compliance
21 with the contract and from a technical perspective,
22 that was the responsibility of the IT industry
23 development department, which I led, and if we want
24 to, as you have just mentioned, look at it from a
25 business perspective, what we were trying to ensure

1 was that we understood that .co was a sufficiently ²⁸⁹
2 valuable asset for the state and so we had to assess _{10:12}
3 that along with the Minister. So as a public policy
4 it was the Minister's responsibility, but with the
5 support of the Advisory Committee of the .co domain.

6 **MR BALDWIN:** Mr President, that concludes
7 our cross-examination of Mr Castaño.

8 **PRESIDENT:** Thank you very much,
9 Mr Baldwin. Do you have any re-direct?

10 **MR GOUFFÈS:** We have no re-direct,
11 Mr Chairman.

12 **PRESIDENT:** Thank you. There are no
13 questions from the Tribunal, so Mr Castaño, thank
14 you very much. Thank you for waiting overnight to
15 continue your examination. We appreciate your being
16 here to give your evidence.

17 **MR CASTAÑO:** Thank you very much.
18 (The witness withdrew)

19 **MR GOUFFÈS:** Mr Chairman, you asked both
20 parties whether they had administrative questions,
21 they say they have one. We have three. One of
22 these three was the one we are going to address
23 which is probably the most important. Can we
24 address the two others quickly so that we dispose of
25 them?

1 **PRESIDENT:** Well, we would have taken them ²⁹⁰
2 had we not had a witness part heard, we would have _{10:13}
3 taken all the questions raised by the parties, but
4 I am very happy to take Mr Baldwin's issue, it is
5 one of those that you want to discuss as well, and
6 if there are other issues that Respondent wishes to
7 raise we will hear from you on those too.

8 **MR GOUIFFÈS:** That is okay, Mr Chairman.

9 **PRESIDENT:** Very well. Mr Baldwin, please
10 go ahead.

11 **MR BALDWIN:** Thank you. There was during
12 the clarifications part of the thing yesterday and
13 we are going to pull up the transcript from
14 yesterday and put it on the screen, Mr Gouiffès over
15 there said, page 201 at 4, again, this was during
16 the clarifications part, he said: "We were told for
17 the first time that this is a portfolio company of
18 Golden Gate Capital and then at the beginning
19 Kevin Hughes was presented here in this room as the
20 former general counsel of Neustar who remains
21 general counsel of Security Services LLC. It is
22 unclear whether he is still general counsel of
23 Neustar or just general counsel of Security Services
24 LLC. On his LinkedIn profile he appears as general
25 counsel still of Neustar but it is unclear".

1 So in response I stated also as a response ²⁹¹
2 to that clarification, I said, and I pointed counsel _{10:15}
3 to exhibit C-135, which is an exhibit in the record,
4 and I mentioned that it provides clarifications that
5 he talked about including Golden Gate Capital.

6 Now I would like to put the email that we
7 received last night from Respondent's counsel, and
8 this was not copied to the Tribunal but it wasn't
9 intended to be. There was nothing wrong with not
10 copying it to the Tribunal, it wasn't intended, but
11 we wanted to raise it today, and you see the
12 response was –

13 **MR GOUIFFÈS:** Sorry, Mr Baldwin, to
14 interrupt. Of course I sent this lawyer to lawyer
15 before we have any discussions with the Tribunal.
16 So I was not expecting we were having this
17 conversation straight away before the Tribunal. But
18 that is fine of course. But can we see the top of
19 the email? Yes, it says the wrong time, it wasn't
20 at 4 pm.

21 **MR BALDWIN:** It would have been 9.16 pm
22 local time.

23 **MR GOUIFFÈS:** That is okay. And you can
24 read it all, that is no problem, yes.

25 **MR BALDWIN:** And I said, I am not at all

1 saying that Respondent's counsel was wrong in not ²⁹²
2 sending it to the Tribunal, it was a communication _{10:16}
3 to there, but because of what is listed in here
4 I think it is important that we discuss it and –

5 **PRESIDENT:** I think, if I recall
6 correctly, and if I am wrong you will no doubt tell
7 me so, that what I said is you should try to work
8 this out between you and then if there was a
9 difficulty, come to the Tribunal

10 **MR BALDWIN:** The issue is we had raised
11 that clarification in response to their – for
12 Respondent's counsel saying this is the first time
13 they had heard it, and he, you know, raised a number
14 of issues here and said that he was going to bring
15 this to the Tribunal's attention, so I think it was
16 not us that are seeking to bring it – we are
17 bringing it to the Tribunal's attention because it
18 was raised in a manner yesterday by Respondent's
19 counsel.

20 We have given them the documents. The
21 other documents are available and accessible, so
22 Laurent here says that the five-page press release
23 here is no way sufficient –

24 **MR GOUIFFÈS:** Can we read that email
25 entirely because from the beginning, "Dear Teddy and

1 Chloe" and I suggest we read it once and then you ²⁹³
2 make your points and then we can discuss, but let's _{10:17}
3 read it at least. You can read it or I can read it,
4 if you want.

5 **MR BALDWIN:** "Dear Teddy and Chloe,
6 following on the hearing today and as per the
7 Chairman's indications, we have further reviewed
8 exhibit C-135."

9 "We can confirm that this 5-page press
10 release dated 1 December 2021 is in no way
11 sufficient to answer our doubts regarding
12 Security Services LLC's legitimacy as a claimant in
13 this arbitration, or its ability and willingness to
14 satisfy a potential adverse costs award. In
15 particular, we note that while this press release
16 states that 'Neustar Security Services, LLC [...]
17 has become the newest portfolio company of Golden
18 Gate Capital and GIC:

19 1. "It fails to provide any indication as
20 to whether 'Neustar Security Services, LLC' is a
21 different company from 'Security Services LLC'."

22 2. It does not confirm that
23 Security Services LLC has any substantial business
24 operations or at the very least enough resources to
25 cover a substantial adverse costs award.

1 3. It does not provide any specific ²⁹⁴
2 information about the precise ownership structure of _{10:18}
3 Security Services LLC, or its officers and
4 directors.
5 4. There is not even any mention of
6 Mr Kevin Hughes, and whether he remains General
7 Counsel of Neustar in addition to being General
8 Counsel of Security Services, LLC.
9 "Against this background, we urgently
10 request that you provide clarifications tomorrow at
11 the start of the hearing ..." which is what we are
12 responding to his urgent request to do that, "and at
13 the start of the hearing regarding Security Services
14 LLC and its ability to cover any potential adverse
15 cost award (including financial documentation),
16 failing which we will have no option but to revert
17 to the Tribunal with all appropriate applications."
18 So this is the reason we are bringing this
19 up today at Respondent's counsel's request.
20 There are several things to say about
21 this. There was an exchange of letters, in addition
22 to the Rejoinder which has a section on this,
23 because the Rejoinder came after this spin-out.
24 There was an exchange of letters back and forth.
25 This is where this exhibit C-135 comes from, it was

1 part of those letters, but it wasn't the only part ²⁹⁵
2 that was part of those letters. _{10:20}
3 C-135 obviously mention that is Golden
4 Gate Capital, which we said before in pleadings and
5 I think we even said it in our opening, is a US
6 entity and is the ultimate beneficial owner of
7 Neustar Security Services.
8 The previous ownership of Neustar Inc was
9 also confirmed in exhibit C-136, which was the UPA,
10 which is the document that showed the spin-out.
11 That is exhibit C-136. I will note that in the
12 letter that we sent to the Tribunal on 29 July 2022,
13 in response to a letter from Respondent's counsel,
14 we stated that, because this was sent at 9 we don't
15 have all these, but they are in the record of
16 letters that were sent to the Tribunal. I will read
17 this section. It says:
18 "On December 1, 2021, the owners of
19 Claimant sold Neustar and the majority of its
20 business assets previously held under the umbrella
21 of Neustar, including the rights to the name
22 Neustar, to TransUnion".
23 It says: "Under the terms of the spin
24 out, the Claimant (now Security Services LLC, d/b/a
25 Neustar Security Services, a US limited liability

1 company) retained and continues to retain the rights ²⁹⁶
2 to this arbitration. For the avoidance of doubt, _{10:21}
3 the Claimant remains under the same ownership as
4 Neustar prior to the spin out."
5 This is because the entities that were the
6 ultimate beneficial owners of Neustar Inc were
7 Golden Gate Capital and GIC. They remain the same
8 owners of Security Services, which is LLC, which is
9 the name of the entity, but Neustar
10 Security Services is their d/b/a, it is what they do
11 business as, and that is reflected in the name of
12 the proceeding.
13 And I mention this because this is from
14 July 29, 2022, so this was now -- what was that --
15 eight months ago, and this information was released
16 Respondent's counsel got a copy of the UPA, so did
17 the Tribunal, which sets out the terms and
18 conditions of this. It is a corporate document.
19 They have had that for months now too and again in
20 our letter of 15 September 2022, in a letter to the
21 Tribunal of 15 September 2022, we said
22 "As noted by the Claimant in its letter of
23 reply, Golden Gate Capital has been the consistent
24 ultimate beneficial owner of every entity who has
25 had the rights under the ICSID claim. This is not

1 directly relevant," because they are not a claimant, ²⁹⁷
2 but -- because they are not a claimant, I just _{10:23}
3 added. I will go back to just reading it:
4 "This is not directly relevant but meant
5 to show that Respondent's bad faith arguments are
6 misplaced. Golden Gate Capital is and has been a US
7 entity. The claim could have been brought in Golden
8 Gate Capital's name or another US entity in the
9 chain of ownership", and then it goes on in some
10 other ways, but the one important part is, it says:
11 "This was not some sub rosa transaction
12 designed to create jurisdiction, but was a
13 USD 3.1 billion transaction that was reported by the
14 Wall Street Journal, Forbes, Nasdaq among many
15 others. The spin-out is, as Hogan Lovells has
16 described, because we submitted their documents, an
17 increasing trend in corporate transactions and this
18 is nothing sinister".
19 As part of that letter we submitted
20 several citations which included Bloomberg's
21 reporting on it, Golden Gate Capital's website, the
22 US Securities and Exchange filings that reported the
23 transaction, TransUnion's reporting of the
24 transaction and others.
25 So we have submitted substantial evidence

1 to explain this back in July, and then further in ²⁹⁸
2 September and October, including cites that give _{10:24}
3 information about the business. Security Services
4 LLC is a substantial business. It is a substantial
5 security business that has a product called Ultra
6 DNS, which is security for domains, and I believe
7 they are continuing to work on domains even for the
8 .co domain, Security Services to this date but they
9 certainly work security for domains. This is a
10 substantial company with about 250 employees. There
11 is nothing hidden about it. The company has a
12 website. It is a private company so the financials
13 aren't public, but it is certainly not some shell,
14 some sinister, some other company, and we have
15 relayed this.

16 In terms of Mr Hughes, I will say that one
17 of the nice things – oh, and I am reminded that
18 they have more than 2,000 customers, and the
19 customers aren't like people walking into a store
20 but customers that buy domain operators, registry
21 operators and others that need security for their
22 business, so business customers, B2B-type stuff.

23 So that is where we are.

24 In terms of Mr Hughes, there was a
25 discussion yesterday that I read in the transcript

1 about his LinkedIn page, and it must be nice to be a ²⁹⁹
2 general counsel as opposed to a lawyer who is always _{10:26}
3 trying to find business and has to spend a lot of
4 time on LinkedIn, because the fact is Mr Hughes
5 doesn't spend time on LinkedIn, but he is here. You
6 can certainly talk to him, obviously, and he just
7 doesn't update his LinkedIn page.

8 But better than a LinkedIn page, the
9 California bar, of which Mr Hughes is a member,
10 maintains records as to the employment of its
11 lawyers and had Respondent's counsel looked up that
12 record, which is a record from the Bar Association
13 of California, rather than LinkedIn, he can see very
14 clearly that, when the spin-out happened Mr Hughes
15 left his role as the general counsel of Neustar Inc
16 because of the spin-out and became, and still is,
17 the general counsel of Security Services LLC d/b/a
18 Neustar Security Services.

19 So all this information is out there.
20 Information about the size of the company is out
21 there, information about their business operations,
22 and not only is it out there publicly, but we have
23 produced it in this arbitration. We produced it in
24 July and then in response to further inquiries in
25 September and October, so this is not something new .

1 It wasn't learned for the first time yesterday, as ³⁰⁰
2 had been claimed, and we just should not in the _{10:27}
3 middle of preparation for this hearing be subject to
4 demands of an incident from July because
5 Respondent's counsel doesn't want to do the basic
6 work to even look back on the pleadings that we have
7 done, much less do the minimal due diligence to see
8 anything about the company, which we have reported
9 on and we reported on back in July, September and
10 October.

11 So again, we are in another edition of the
12 clarifications phase, Mr Hughes is here, he can
13 answer questions if necessary, and if there is other
14 questions that they have, but this is an issue that
15 we should not have to be dealing with and we have
16 said that, you know, we have to provide
17 clarifications to mark the start of the hearing, so
18 we have done that, but the clarifications, except
19 for the Bar Association. I didn't realise that they
20 were going to bring up the LinkedIn, the fact that
21 Mr Hughes, his LinkedIn shows his old job, but
22 besides that, the rest of this has been in the
23 record, it has been in there. The UPA, which is the
24 contractual document, shows the business that was
25 being retained by Neustar Security Services, so this

1 is all out there, and that is my clarification as ³⁰¹
2 requested by Respondent's counsel. _{10:29}

3 **MR GOUIFFÈS:** Mr Chairman, we would say
4 this clarification raises even further concerns as
5 far as we are concerned, because I think this is a
6 pleadings. You got a reference to press release,
7 Bloomberg, et cetera. That shows that there is no
8 issue. You got a pleading that this is a
9 substantial business. That is my colleague saying
10 it here on record to this Tribunal, then
11 clarifications also. I don't know on the exact
12 position of Mr Hughes, who of course could have been
13 a witness as he was from Day 1 in this arbitration
14 behind the Request for Arbitration, he actually
15 signed the letter of intent, so he was there from
16 the beginning in this dispute.

17 I will say three things. The first is
18 when we raised this issue yesterday we were shut
19 down by saying oh, look at C-135, and this answers
20 all your questions. What is C-135? This is again a
21 press release. It is a three-page document and
22 I would be happy –

23 **MR GONZÁLEZ:** Can you put it up, please?

24 **MR GOUIFFÈS:** We would like to put that
25 document up and ask our colleagues, or maybe I will

1 carry on with my answers and then we will ask them ³⁰²
 2 to show in this document where there are any points ^{10:30}
 3 which clarify and satisfy our request from
 4 yesterday. So that is the first point. The first
 5 point is yesterday we raised concerns and we were
 6 told, you were told, Mr President too, you were told
 7 that 135 answers everything –

8 **MR BALDWIN:** I am sorry. I need to have
 9 that pulled up. I am talking about the transcript
 10 where you say I said it answers everything. Could
 11 we pull that up, please? Because you said it
 12 multiple times now.

13 **MR GOUIFFÈS:** I think the Tribunal will
 14 understand what I am saying.

15 **PRESIDENT:** I am not sure we are getting
 16 anywhere. We have an issue which is on the table.
 17 We indicated yesterday that this is a matter that
 18 should be sorted out, resolved by counsel, if
 19 necessary sit down with the documents. Then, if one
 20 counsel is not satisfied, come to the Tribunal and
 21 tell us why you are not satisfied and what you want
 22 us to do about it.

23 **MR GOUIFFÈS:** I was about to have three
 24 points, Mr Chairman. I made my first, which is to
 25 answer this and to say we are not satisfied. The

1 first one is that. What we have at the moment from ³⁰³
 2 the other side is just allegations, a further news ^{10:31}
 3 clipping and the substantial business is just in the
 4 words of Mr Baldwin. We are just asking to show the
 5 documents. That is my first point.

6 My second point, to say that this is just
 7 pleadings, no document. Because we have only
 8 informations and no pleadings we want two things.
 9 We want the proof that Security Services LLC has an
 10 ability to cover a potential adverse costs award and
 11 the precise mechanism of the alleged transfer of an
 12 ICSID claim, and because we do not have that we are
 13 forced to request from this Tribunal an order
 14 against Security Services LLC to post security for
 15 costs.

16 My third and last point is in line with
 17 our submissions of yesterday. We note that an award
 18 of costs should be granted not only against
 19 Security Services LLC, but also against Neustar Inc.
 20 Neustar Inc is the party which initiated this
 21 arbitration. When you start an arbitration, if a
 22 tribunal were to dismiss that claim on jurisdiction
 23 or on the merits and award costs, it would do so and
 24 address the costs against the party which initiated
 25 the arbitration, that would be fine, it is Neustar

1 Inc here. This is all the more given that we ³⁰⁴
 2 understand Security Services LLC and Neustar, and ^{10:33}
 3 then this is the second document which has just been
 4 mentioned, have an agreement in place, which is the
 5 UPA, which is exhibit 136, which regards the claim.
 6 So three points, and this is my conclusion.

7 The first is all that you have been told
 8 here is just hearsay, words and press release. That
 9 is it.

10 The second is we want a security for costs
 11 against Security Services LLC.

12 And the third is we want an award against
 13 Neustar Inc and not just against Security Services
 14 LLC.

15 Now, we can have a look now at 136, or I
 16 can ask my colleague to point out where in this
 17 document it gives the clarifications of the points
 18 I have just raised or I raised yesterday already.

19 **PRESIDENT:** We can go ahead and bring the
 20 document up and you can show it to the Tribunal and
 21 we can take issues from there.

22 Your third point, if I understand, is you
 23 want an order for costs. That is the final thing
 24 that would be happening in an arbitration.

25 **MR GOUIFFÈS:** No, sorry –

1 **PRESIDENT:** Your second point, as ³⁰⁵
 2 I understood it, is that you want security for ^{10:34}
 3 costs. Now, if you want security for costs, you
 4 would need to file an application for that and we
 5 would have to hear from the other side on that basis
 6 and then the Tribunal can reach a conclusion on
 7 that.

8 **MR GONZÁLEZ:** That is exactly right and we
 9 did adhere strictly to what the Tribunal instructed
 10 us yesterday. We did exactly what you asked us to
 11 do. We looked at the documentations. We saw that
 12 it did not satisfy at all what our request was. We
 13 had the courtesy of sending an email, as the
 14 Tribunal instructed us to do, to try to work it out,
 15 not to wait until this morning and I apologise if
 16 the language of my colleague in English wasn't quite
 17 as clear as maybe we could have made it, but I think
 18 it was clear to my colleague across the table that
 19 the idea was exactly what the Tribunal had
 20 instructed us to do, try to work it out. We did not
 21 have anything and we tried to give them another
 22 alternative and say give us something else before we
 23 go before the Tribunal. They did not.

24 So the answer is it does not satisfy us.
 25 We will make the application that the Tribunal is

1 asking for with regards to the security for costs, ³⁰⁶
2 No 1. No 2, what we are asking, which frankly is ^{10:35}
3 not an application because I think the Tribunal
4 already has the inherent authority and power to do
5 so, is that in the final award which, correctly
6 stated, is yet to be determined and yet to be
7 decided in terms of the award of costs. But if and
8 when, which we are confident you should, find costs
9 in favour of Colombia, that that cost should be
10 found against both entities.

11 This is not simply the case of a change of
12 name. This is not one company that simply changed
13 its name from Neustar to Security Services Inc.
14 I think at least that part we have clear. So this
15 Tribunal has the authority in the award to issue the
16 award against both of these entities so we are not
17 left chasing one or the other in terms of that.

18 **PRESIDENT:** Mr González, I understand that
19 point and, if that is your submission, then I think
20 that is something which we will have to hear from
21 you from, and again we will have to hear from the
22 other side to the extent that they accept that or
23 they accept that they do not accept that. But that
24 is further down the road.

25 **MR GONZÁLEZ:** I totally agree and --

1 **PRESIDENT:** You made it very clear ³⁰⁷
2 yesterday, I don't remember whether it was you who ^{10:36}
3 did so, or Mr Gouiffès, but one of you made it very
4 clear that you were looking for costs from Neustar
5 as well. I understand that point

6 But at this stage, for today's purposes,
7 I am happy for you to take the Tribunal through
8 these documents that you feel that are relevant.
9 The alternative is to file an application, if that
10 is what you want to do, for security for costs, and
11 file that in the normal way, showing the authority
12 of the Tribunal, what the security for costs are,
13 what costs you say should be provided for, and then
14 we have a timetable for the Claimant to respond and
15 the Tribunal will look at it.

16 **MR GONZÁLEZ:** Yes. That is fine. And
17 again, we apologise if this got longer than it had
18 to be. It was pre-empted by counsel raising the
19 issue first. Our intention simply was, as my
20 partner said earlier, we were going to raise this
21 issue, simply report that there has been no
22 satisfaction on this issue and that we will make the
23 proper applications at the proper time. So I think
24 that is exactly where we are at now on that issue.
25 So I think that concludes it.

1 **PRESIDENT:** Is there anything else we need ³⁰⁸
2 to discuss while we are here -- ^{10:38}

3 **MR GONZÁLEZ:** On that issue.

4 **PRESIDENT:** On this particular issue,
5 Mr Baldwin, anything you want to add?

6 **MR BALDWIN:** We were instructed to provide
7 clarifications at the beginning of the hearing. We
8 sought to do that. There are plenty of documents to
9 show the things that they requested. This was from
10 July. They have even had a Rejoinder since that
11 time --

12 **PRESIDENT:** We heard that.

13 **MR BALDWIN:** -- where they put all this
14 information in. Now they are seeking to raise it.
15 Obviously if they want to make an application they
16 should make it in writing, not at 9 pm telling us to
17 provide clarifications at the hearing the next
18 morning. So that is our point. We don't want to be
19 discussing this. We want to be doing the hearing
20 like we should be.

21 **PRESIDENT:** I am going to make a
22 suggestion to counsel. During the break later, if
23 it is Respondent's intention to file an application
24 for security for costs, could counsel discuss it
25 between themselves how long Respondent will want

1 before they make their application, in writing ³⁰⁹
2 obviously, and then how long Claimant will want to ^{10:39}
3 respond to that. Otherwise we can sit here and
4 discuss how long, how long. This is a matter that
5 should be worked out by experienced counsel and then
6 you can tell us what you have agreed and make the
7 application.

8 **MR GOUIFFÈS:** Mr Chairman, on this point
9 this is clear, so we will do that. What we had in
10 mind, as I said before, was to discuss three points,
11 administrative points with you, one of those was
12 this one. Our intent was not to have too much
13 discussions now because we have the witnesses still
14 waiting. We just wanted to raise this point with
15 you so that you have them in mind before lunch and
16 then you can also make decisions. So if I may, can
17 I get to the two other points? They will be much
18 shorter.

19 **PRESIDENT:** While we are talking about the
20 points, let's go ahead.

21 **MR GOUIFFÈS:** The clarification of course
22 was the clarification we asked and this was the
23 biggest point. There was also a clarification asked
24 to us on two slides out of the 85 slides we
25 presented yesterday and we suggest we clarify that

1 later today after we have heard from the witnesses, ³¹⁰
 2 or tomorrow morning, or later, whenever it is _{10:40}
 3 convenient for the Tribunal. Of course if you want
 4 us to address it now we are ready, but we suggest it
 5 can be dealt with after the witnesses, maybe even
 6 later today.

7 The third point, perhaps I pass back the
 8 floor to my partner, Dan, is about just the rest of
 9 this procedure.

10 **PRESIDENT:** Let's deal with your second
 11 point, or is it your first point, I can't remember,
 12 the slides for clarification.

13 Unless you feel you need to deal with that
 14 now, I would suggest we deal with our witnesses.
 15 Perhaps tomorrow morning? And we come to that in
 16 the presentations tomorrow morning. Is that
 17 agreeable?

18 **MR GOUIFFÈS:** Very good.

19 **MR GONZÁLEZ:** On the second point I think
 20 all we will need to do tomorrow morning or later
 21 today is just put on the record the clarification,
 22 because I think we have the clear answer with regard
 23 to those slides.

24 On the third point, all it is actually is
 25 a suggestion so we anticipate so we don't wait until

1 the end of the day, there has been talk amongst the ³¹¹
 2 parties and the Tribunal about perhaps using _{10:41}
 3 tomorrow, either later today when we finish with the
 4 witnesses or tomorrow morning, as some opportunity
 5 to have some sort of question and answer.

6 If the Tribunal is so inclined, for
 7 example, if you are formulating some questions as we
 8 are listening to the witnesses, would like to
 9 provide that to us before the end of the day we
 10 could be therefore prepared to respond to them more
 11 efficiently tomorrow morning. So we wanted to raise
 12 that to see if that is the direction the Tribunal is
 13 going to go with the use of whatever remaining
 14 time we want to use.

15 **PRESIDENT:** If we decide to have
 16 questions, if we have specific questions, we will
 17 either flag them to you before we close today or
 18 later in the evening. We will come back to that
 19 towards the end of the day.

20 **MR GONZÁLEZ:** That is all we wanted to
 21 ask. Thank you very much.

22 **PRESIDENT:** Anything else from
 23 Respondent's side?

24 **MR GOUIFFÈS:** Nothing, Mr President, no.

25 **PRESIDENT:** Mr Baldwin, anything from your

1 side?

2 **MR BALDWIN:** No, Mr President. ³¹²
_{10:42}

3 **PRESIDENT:** Before we take our next
 4 witness -- we have been going an hour and ten
 5 minutes -- would it be an appropriate time to take a
 6 break? I do want today, whoever has the floor, we
 7 should try and aim round about an hour and a half to
 8 have a break for our court reporters and the
 9 translators.

10 So let's take 15 minutes now. By my clock
 11 it is just after 20 minutes to 11 and we will revert
 12 then, and our next witness will be --

13 **MR GOUIFFÈS:** Sylvia Constaín, the former
 14 Minister.

15 **PRESIDENT:** Thank you. We will adjourn
 16 for 15 minutes.

17 (Short break from 10.42 am to 10.59 am)

18 SYLVIA CRISTINA CONSTAÍN

19 **PRESIDENT:** Welcome back. We didn't
 20 manage to quite do our 15 minutes' break, but we
 21 didn't go too much over that. Thank you very much.

22 We move now to the examination of

23 Ms Constaín. Welcome, Ms Constaín. Thank you for
 24 coming to give evidence to us.

25 You were here yesterday morning at the

1 openings so you know who the Tribunal are and you ³¹³
 2 know who the counsel are on both sides? _{11:00}

3 **MS CONSTAÍN:** I do, Mr Chairman.

4 **PRESIDENT:** You have in front of you a
 5 statement. Could you please read that into the
 6 record?

7 **MS CONSTAÍN:** Yes. I solemnly declare
 8 upon my honour and conscience that I shall speak the
 9 truth, the whole truth, and nothing but the truth.

10 **PRESIDENT:** Thank you very much. We have
 11 from you one witness statement. It is dated
 12 23 February 2022. Can you confirm that everything
 13 in this statement is correct to the best of your
 14 knowledge and belief?

15 **MS CONSTAÍN:** I can confirm that, yes.

16 **PRESIDENT:** Is there anything that you
 17 wish to change?

18 **MS CONSTAÍN:** There is nothing.

19 **PRESIDENT:** I am going to ask that you
 20 answer the questions that are put to you as
 21 accurately as possible. If there are any questions
 22 that you don't understand, ask for clarification.
 23 If you don't know the answers, just say so.

24 **MS CONSTAÍN:** I will do that. Thank you,
 25 sir.

1 **PRESIDENT:** Thank you. 314
11:01
2 **Examination by Respondent**
3 by Mr González
4 **MR GONZÁLEZ:** Good morning, Ms Constaín.
5 Before we tender you over to cross, I would like the
6 Tribunal to get a little bit of background from you.
7 Can you tell us a little bit about yourself, a
8 little bit about your academic and professional
9 experiences before you became the Minister of
10 Telecom?
11 **MS CONSTAÍN:** Absolutely. I am 54 so I
12 started –
13 **MR GONZÁLEZ:** For the record I did not ask
14 you your age. I know better than to ask you that
15 question. That is always objectionable. If you
16 will speak a little closer to the mic it probably
17 would be better.
18 **MS CONSTAÍN:** I started working – I am an
19 economist by training, I got my MBA right after
20 school, so after that I've worked basically for
21 many, many years with the government. I worked in
22 our mission to the World Trade Organisation in
23 Geneva for four years. Then I worked in our
24 Ministry of Trade Industry and Tourism where I led
25 international negotiations. I then went to the US,

1 where I was deputy at our trade bureau and then led 315
11:02
2 our relationships with congressional affairs,
3 basically, in the US, and eventually became deputy
4 chief of mission.
5 In those interims I worked a little bit
6 with the UN, and then after I left that, let's say,
7 time in government, I went to Harvard for a year
8 where I was a fellow. I worked as a consultant with
9 several international organisations on consultancy
10 contract and then I went back to the UN for a while
11 I am now – after that, I joined Apple and
12 I worked both at Apple and at Facebook. I then
13 joined the campaign for President Duque when he was
14 still a candidate, and I am now working at a
15 payments technology company called Visa
16 **MR GONZALEZ:** Thank you, Ms Constaín, and
17 in fact I will jump to today since that is where you
18 left off. Today do you have any professional
19 responsibilities or employment by Colombia?
20 **MS CONSTAÍN:** No, I do not.
21 **MR GONZÁLEZ:** And are you being paid in
22 any way for your testimony and your time here today?
23 **MS CONSTAÍN:** No, I am not – well, I mean
24 they are paying my hotel and flight.
25 **MR GONZÁLEZ:** Thank you for that. Thank

1 you. 316
11:04
2 Now let's go back to the beginning, and
3 let's go back to August 2018. That is when you
4 assumed your role as Minister for
5 telecommunications. Is that correct?
6 **MS CONSTAÍN:** Yes.
7 **MR GONZÁLEZ:** Can you tell the Tribunal
8 how you went about preparing for that new role and
9 taking on that new role, and of course I know that
10 role was a lot broader, I would like you to limit
11 your question for today to as it related to the .co
12 domain.
13 **MS CONSTAÍN:** I first learned about the
14 .co domain in the transition period because I led
15 part of the transition team from former President
16 Santos to the new incoming president, which was
17 President Duque, and then once I actually joined the
18 Ministry I formed a team, a group, on this issue
19 where I asked them to please take a look at the
20 information that was in the Ministry and to present
21 a brief to me about where we were, what our options
22 were, and suggested next steps. So I got the
23 information from the prior administration, we did
24 our internal work, and then we created a plan for
25 next steps.

1 **MR GONZÁLEZ:** And what was your assessment 317
11:05
2 of the status of the .co domain operations at the
3 point you took over?
4 **MS CONSTAÍN:** I guess we always go back as
5 when you are in public service to the reason why you
6 are in public service, so obviously the objective of
7 being in public service is to serve the public. So
8 that was the most important element.
9 We realised that the conditions under
10 which the contract that Colombia had at that moment
11 were not in line with market reality, and we started
12 understanding more about the .CO market because
13 frankly we didn't have the internal expertise that
14 I would have liked to have had at that point, so we
15 started seeking that kind of expert knowledge where
16 it is, which is basically in both the international
17 arena and certain domestic experts.
18 **MR GONZÁLEZ:** And if you can take us
19 further forward, then, what was the process of your
20 team that you implemented, and first of all, I would
21 like to separate it into two parts. First in making
22 the decision in either renewing or not renewing the
23 2009 concession, and then subsequently I am going to
24 ask you about the public tender, but first focusing
25 on that decision with regards to renewing or not?

1 **MS CONSTAÍN:** Well, as I said, I am an ³¹⁸
 2 economist, so I am data driven. I like numbers and _{11:07}
 3 I like objective criteria, so the first thing we did
 4 was find international support to be able to make
 5 sure that the analysis we were doing was broad in
 6 scope and that it reflected the reality of the
 7 market right then and there.

8 That took us, I have to say, several
 9 months, in part because it is a very, I would say,
 10 niche area. There are a very limited number of
 11 top-level domain names with country codes, so we
 12 went to the ITU, we had domestic also support, and
 13 India and Australia had just done their processes,
 14 so the ITU also provided us with information on
 15 those processes, and with all the information –
 16 overwhelming, I would say, information that we had
 17 in front of us, we made the decision that we thought
 18 was the best thing for the Colombian government and
 19 people would be for us to basically open it up to
 20 anybody who would be interested in the management of
 21 the asset.

22 **MR GONZÁLEZ:** So now tell us about that
 23 process. Tell us about how that tender process
 24 worked and how did you ensure that that process was,
 25 as you said, open to the public?

1 **MR GONZÁLEZ:** You have explained generally ³²⁰
 2 for the general public. I would like to focus now _{11:10}
 3 specifically on Neustar. What did you and your team
 4 do to ensure that Neustar was treated fairly and
 5 reasonably during the process, both as the former
 6 concessionaire of the 2009 concession and then as
 7 one of the potential tender offerees?

8 **MS CONSTAÍN:** What I would say is they are
 9 two different processes. The relationship with
 10 Neustar with regard to the operation of the contract
 11 that was in place remained, the technical
 12 conversations, the oversight conversations remained,
 13 but when it came to the tender process, Neustar was
 14 like any other participant. It did not have any
 15 additional rights that the others didn't have, nor
 16 any less rights than what the others had. This had
 17 to be a process where everybody who wanted to
 18 participate got to do so on a level playing field.

19 **MR GONZÁLEZ:** Thank you. Can you explain
 20 to the Tribunal, and the Tribunal has heard a little
 21 bit about this advisory committee that existed, the
 22 .co domain advisory committee. Can you explain why
 23 Neustar was excluded from that committee beginning
 24 3 December 2018?

25 **MS CONSTAÍN:** Yes. When we came in, as

1 **MS CONSTAÍN:** So the processes in general ³¹⁹
 2 in public procurement, but in the Ministry in _{11:08}
 3 particular, was I would say a very participative and
 4 collaborative process. What we would always do is
 5 we would start with a basic draft of what the
 6 conditions for a contract would be. We published
 7 them online. We received comments from anybody who
 8 had any interest in them. We went back and reviewed
 9 every single comment and answered, either
 10 specifically or generally, like when one comment
 11 comes in 15 times then you don't have to answer 15
 12 times, you kind of group them and say with regard to
 13 this issue this is our comment.

14 We take on a lot of those comments and
 15 some obviously we don't, but that is the way that
 16 you build a robust tender document, obviously always
 17 starting first on objective criteria and examples
 18 from others, and then making it kind of homegrown
 19 and reflecting your own market to make sure that you
 20 have the best, you know, basis for the tender that
 21 you can have.

22 All the information is public, all the
 23 questions, all the answers, all the drafts, it all
 24 goes on a website, and anybody, as I say, who wants
 25 to can participate in it.

1 I shared, the advisory committee was really the ³²¹
 2 centre of knowledge, big or small, but the centre of _{11:11}
 3 knowledge that we had within the Ministry regarding
 4 a country-code top-level domain. So instead of
 5 creating a new committee for the review of the
 6 possibility or the structuring of a tender, we
 7 decided to build on that internal knowledge, and in
 8 that what we did was we expanded the scope of the
 9 issues that the Committee could look at. And when
 10 it came to the specific scope that we created of
 11 making a recommendation with regard to whether to
 12 extend the current contract or to open a new bid,
 13 basically that part of whether a new bid should be
 14 opened was a new assignment to that committee.

15 So the Committee for that purpose did not
 16 require the current contract operator, which was
 17 Neustar, because that was a conversation that was
 18 simply different. So as we expanded the breadth of
 19 the objective of the committee for those purposes,
 20 Neustar just simply – it wasn't appropriate for
 21 them to be in those conversations.

22 **MR GONZÁLEZ:** Thank you. I have no
 23 further questions.

24 **PRESIDENT:** Mr Baldwin, please.

25 **Cross-examination by the Claimant**

1 by Mr Baldwin 322
11:13
2 **MR BALDWIN:** Thank you, Mr President.
3 Good morning, Ms Constaín.
4 Just to clarify, and I mean this as a
5 clarification, you were talking about Neustar being
6 involved in those meetings, and you said Neustar
7 being the operator. You mean .CO Internet?
8 **MS CONSTAÍN:** Yes. .CO Internet. It is
9 my understanding that Neustar is the owner, but if
10 not, please let me know.
11 **MR BALDWIN:** No. That is correct. I
12 wanted to say because the record shows you saying
13 Neustar was the operator, Neustar was in the
14 meetings. It was .CO Internet, right?
15 **MS CONSTAÍN:** Yes, exactly.
16 **MR BALDWIN:** Since we are on that subject,
17 though, tell me, is your role as Minister, we are
18 doing this just out of order just because of what
19 was just discussed, but in your role as Minister,
20 what did you understand – were you aware of
21 Neustar? Do you remember when the first time you
22 became aware of Neustar as opposed to .CO Internet,
23 who was operating the concession and attending the
24 advisory meetings prior to December 2018. Were you
25 aware of Neustar, that Neustar owned .CO?

1 **MS CONSTAÍN:** What I would say is that 323
11:14
2 I first became aware of the issue when I was
3 provided the 2018 document. If you have the 2018
4 document, we can see if it says Neustar or .CO. If
5 it does, then I would have become aware of it right
6 there. If it doesn't, then I honestly don't
7 remember when was the first time that I heard the
8 word Neustar, or .CO for that matter.
9 **MR BALDWIN:** Okay. So the answer is you
10 are not aware when you first heard the name Neustar
11 or became aware that Neustar owned .CO Internet?
12 **MS CONSTAÍN:** No. The answer is the first
13 time that I became aware of the issue was when I saw
14 the 2018 report, and if it is in the 2018 report, I
15 did read the 2018 report, so that would have been
16 the first time.
17 **MR BALDWIN:** That would have been the
18 issue, but I am not asking about when you learned of
19 the issue. You had that in your testimony. You
20 discussed that I believe again today. I am asking
21 when you first learned that Neustar was the owner of
22 .CO, if you remember. If not –
23 **MS CONSTAÍN:** No. I can honestly say that
24 I don't remember. I am guessing it was the day that
25 I saw the report, but I don't know when was the

1 first time that I heard the word Apple either when 324
11:15
2 I bought the phone, so I don't know
3 **MR BALDWIN:** Let's go back to the
4 beginning and talk about your biography a little
5 bit. As you mentioned Apple, Facebook, a lot of –
6 I have an Apple computer here and I love Facebook,
7 so it is good to see your background. But your
8 background at those companies, you mentioned your
9 background being more of an engineer background?
10 You said you loved data or more of a business
11 background. What is your background generally?
12 Your educational background.
13 **MS CONSTAÍN:** I am an economist by
14 training. I have an MBA from the University of Los
15 Andes. I was a fellow at Harvard in international
16 relations, and I am now getting an executive MBA at
17 the MIT.
18 **MR BALDWIN:** I meant to say economics, and
19 I said engineering. But at some point your career
20 turned more to government relations. Is that
21 correct?
22 **MS CONSTAÍN:** I was in government for over
23 20 years, yes.
24 **MR BALDWIN:** Including some of the private
25 companies you worked for being involved?

1 **MS CONSTAÍN:** My role in Apple, Facebook 325
11:17
2 and now at Visa is in charge of our relationships
3 with governments. Yes, that is accurate.
4 **MR BALDWIN:** Without giving away trade
5 secrets or secrets of those companies, what
6 generally does that mean, being involved in
7 government relations, let's say at your current
8 employment? What does that mean, government
9 relations?
10 **MS CONSTAÍN:** Well, in each one of the
11 companies the names are a little bit different, so
12 public policy in one, government relations in
13 others, government engagement in another, and it
14 basically is the way that we provide information to
15 governments to promote policies that lead to the
16 growth of the industry.
17 Where I am now, for example, in digital
18 payments, we provide information for governments on,
19 you know, what are the best practices worldwide,
20 what are good practices or policies for increase in
21 digital payments. We work often through trade
22 associations where we, as an industry, share
23 thoughts on these issues, so that is our role
24 **MR BALDWIN:** And you held, as you said you
25 have been in government and then you have been in

1 this government relations aspect, this is ³²⁶
 2 paragraph 3 – I am certainly happy for you to read ^{11:18}
 3 paragraph 3, this is your biography so I assume you
 4 know it very well – from April 2002 to June 2004
 5 you were the director of foreign investment and
 6 services at the Ministry of Trade, Industry and
 7 Tourism.

8 **MS CONSTAÍN:** Yes. That is accurate

9 **MR BALDWIN:** Could you describe what your
 10 role there was, as the director of foreign
 11 investment? Can you explain what you were involved
 12 in?

13 **MS CONSTAÍN:** We were in charge of seeing
 14 the behaviour of foreign investment, is it going up,
 15 is it going down, what kinds of policies we should
 16 put into place to promote foreign investment, making
 17 recommendations as to those policies, talking to
 18 industry in the private sector – you know, with
 19 foreign investors. As its name conveys, it was in
 20 charge of public policy in the realm of foreign
 21 investment.

22 **MR BALDWIN:** The TPA I don't think came
 23 about – you are familiar with the Trade Promotion
 24 Agreement between the US and Colombia?

25 **MS CONSTAÍN:** I am familiar, yes.

1 I haven't read the whole thing but I do know what it ³²⁷
 2 is. ^{11:20}

3 **MR BALDWIN:** You are familiar that it
 4 exists, and I will tell you that it was around 2012.
 5 So in 2002 to 2004 it didn't exist, it hadn't been
 6 signed or initiated. But were you involved during
 7 that period as the director of foreign investment,
 8 were you aware of bilateral investment treaties?
 9 Were you aware of investor-state arbitration at all?

10 **MS CONSTAÍN:** Yes, I in fact have worked
 11 in investor-state arbitration several times over my
 12 career. I was a negotiator for bilateral investment
 13 treaties while at the Ministry. I also started,
 14 when the TPA negotiation started, I was heading the
 15 intellectual property investment and services
 16 negotiations, and during my time at UNCTAD we did
 17 training sessions for investment negotiators in
 18 developing countries.

19 **MR BALDWIN:** And you say you were the
 20 deputy director of the Colombian Trade Bureau in the
 21 United States from July 2004 to May 2007, and again,
 22 if you can briefly describe what you did in that
 23 role?

24 **MS CONSTAÍN:** We were negotiating – we
 25 had started the negotiations of the Free Trade

1 Agreement and at that time the ambassador asked to ³²⁸
 2 have a negotiator in Washington, so I moved to ^{11:21}
 3 Washington and much of what we did was having
 4 conversations with congress or the administration on
 5 the issues that were important to Colombia in the
 6 negotiation and conveying the why those issues were
 7 important in the negotiation.

8 **MR BALDWIN:** As part of the trade bureau
 9 did you liaise with US companies that were either
 10 trying to – either were already investing in
 11 Colombia or wanted to invest in Colombia? Was that
 12 part of your job?

13 **MS CONSTAÍN:** Yes, that was part of my
 14 job.

15 **MR BALDWIN:** What was your job there?
 16 Just to answer questions they had or was part of it
 17 to help them to promote themselves in Colombia – to
 18 help the US companies promote themselves in
 19 Colombia?

20 **MS CONSTAÍN:** We do not as government
 21 officials help companies promote themselves. That
 22 is not part of the role of a government official.

23 **MR BALDWIN:** What was your role then when
 24 you were working with the US – in promote, I don't
 25 mean get extra advantage, but in this liaising you

1 did with these US companies, did you answer ³²⁹
 2 questions for them? Give them government ^{11:22}
 3 background? Or was it more a regulatory role with
 4 respect to these current or future investors?

5 **MS CONSTAÍN:** We answered questions that
 6 they might have with regard to the regulatory
 7 framework in Colombia, our market, access to
 8 third-party markets, what agreements we might have
 9 with other countries that might make it more
 10 interesting for them to invest in Colombia versus
 11 other countries. So it was very much a promotion of
 12 Colombia as an investment and trade destination
 13 which obviously creates jobs and wellbeing for the
 14 population.

15 **MR BALDWIN:** You started, as you said, in
 16 August 7, 2018 is when you became the Minister?

17 **MS CONSTAÍN:** That is accurate.

18 **MR BALDWIN:** Prior to that – your witness
 19 statement talks about you working in the transition
 20 period prior to officially assuming the role of
 21 Minister. Do you know when you first started
 22 working with MinTIC in any capacity – after the
 23 election of President Duque, do you remember when
 24 you started working with MinTIC in a transition
 25 capacity?

1 **MS CONSTAÍN:** I don't know the exact date, ³³⁰
2 but if you look at my witness statement, ^{11:24}
3 paragraph 4, we can go back to that. I did form
4 part of the transition team for three areas within
5 the transition team, that was finance,
6 telecommunications and what is called the Office of
7 the President, so administrative Office of the
8 President.

9 I don't know when I had my first meeting
10 with each one of them, I did not know that I was
11 going to be Minister at that point, so my role was
12 very much collecting information and creating briefs
13 for our incoming ministers in those three areas, and
14 for the head of the department of the presidency.
15 It was after the election and before taking office.

16 **MR BALDWIN:** Yes. My question was very
17 much limited to that. Do you recall if you were
18 aware of the July 2018 report that we have
19 discussed? Were you aware of that report prior to
20 becoming Minister on August 7? Or was it only after
21 you became Minister on 7 August that you learned of
22 the July 2018 report?

23 **MS CONSTAÍN:** No. We would have had to
24 have had it as part of the transition documentation.

25 **MR BALDWIN:** Let's say before December,

1 because the advisory committee changes in December, ³³¹
2 so I am asking from that time when you were working, ^{11:25}
3 on the transition through November let's say 2018,
4 do you recall what your views were as to whether or
5 not there should have been a renewal of that 2009
6 concession with .CO Internet, or whether it should
7 have gone out to tender? Did you have a view?

8 **MS CONSTAÍN:** I think as I said in the
9 beginning we were very much in the
10 information-gathering phase and in the understanding
11 about the different elements of the .CO in
12 particular, so I did not have any preconceived idea
13 one way or the other.

14 I did have the recommendation that the
15 July 18 document does have very specifically where
16 it suggests that an open fresh bid would be the best
17 alternative, but again I always go back to try to
18 make sure that we have best practices, international
19 best practices, and that is why we recruited the
20 team both through the ITU and domestically for a
21 recommendation.

22 **MR BALDWIN:** I take that to mean in, let's
23 say, when you took office on 7 August 2018, you had
24 not made a decision as to whether or not the
25 contract should be renewed or a new tender should be

1 started? ³³²
^{11:27}

2 **MS CONSTAÍN:** I had not.

3 **MR BALDWIN:** Do you recall when you did
4 decide, when you did decide that it should be a new
5 tender as opposed to a renewal of the 2009 Contract?

6 **MS CONSTAÍN:** Well, the official decision
7 was made on the date that I actually signed the
8 measure, but this, as I guess most decision-making
9 processes are exactly that, it is a process where
10 you find information, you have recommendations, you
11 bring in experts, you create a core team, and so
12 I would say that it was a process. The official
13 date upon which that decision was executed, I would
14 call it that, was the day that we signed the initial
15 resolution.

16 **MR BALDWIN:** Right. And that was your
17 decision, I think you testified. As Minister, you
18 were the one that decided whether it should be a new
19 tender or extending of the concession. Is that
20 correct?

21 **MS CONSTAÍN:** Yes. That is what the
22 Colombian law foresees, and that is exactly what
23 happened.

24 **MR BALDWIN:** And of course on the date
25 that it is signed, you know, that is when the

1 decision is officially made, but my question is do ³³³
^{11:29}

2 you recall what the time period was before the
3 official decision was made, that you had decided as
4 the decision-maker that it was going to be a new
5 tender instead of an extension of the concession?

6 **MS CONSTAÍN:** I don't recall the exact
7 moment or second. As I said, it was a process. The
8 evidence grew as we did more research as to the
9 convenience of having a new transparent, open public
10 tender, but I honestly don't know if it was Tuesday
11 at 7 am or Friday at 9 pm. I don't know. As
12 I said, it was a process, and we continued to look
13 at the evidence. We continued to look at the
14 recommendations from experts and, as I said, I don't
15 really know the exact moment or second. I don't
16 know.

17 **MR BALDWIN:** I am not trying to ask you
18 the exact moment, that would be impossible, but I am
19 more asking generally. Let me ask this. There was
20 an advisory committee meeting on 10 December 2018.
21 You are aware? Do you recall there being one?

22 **MS CONSTAÍN:** Do you have the minutes?
23 I am not part of the advisory committee, so if you
24 have the minutes, then maybe we can look at them.

25 **MR BALDWIN:** Well, let me ask it this. Do

1 you recall that if by 10 December 2018 you had made ³³⁴
2 a decision as to whether or not the contract would _{11:30}
3 be renewed or it would go out to tender? Did you
4 know that on December 10, 2018?

5 **MS CONSTAÍN:** Again, the decision to go to
6 tender was made at the moment where legally I signed
7 the document going to tender. Before that it is a
8 process.

9 **MR BALDWIN:** So up until the day before
10 you signed that, stating that it would go to tender,
11 you still were considering whether or not the
12 concession could be renewed or whether it should go
13 to tender?

14 **MS CONSTAÍN:** That is not what I said.
15 What I said was that the decision is formalised into
16 law, and I guess maybe it would be important for us
17 to go back to what a public servant or civil servant
18 is. We are very much – we live within the confines
19 of very strict laws, very strict legal frameworks –
20 so the decision, any decision, is made through a
21 judicial decision process document, which in this
22 case was that one. But, as I said before, I do not
23 know January, February, September, Monday, Tuesday,
24 Thursday, 3 pm, 5 pm. I don't know what moment it
25 was where that decision was made other than the day

1 that I signed. That was the day that you don't go ³³⁵
2 back. _{11:32}

3 **MR BALDWIN:** Mr González asked a few
4 questions that I wanted to ask, so you have already
5 answered them, but I just want to go over them a
6 little bit, and one of those questions was what was
7 the process of reaching the decision? So can you
8 just again, so we can have it fresh, can you tell me
9 what information – you said you like information
10 with the economics background, you like data– what
11 data and information you used to make this decision
12 to have a new tender instead of renew the
13 concession?

14 **MS CONSTAÍN:** I don't know, maybe the
15 court reporter could read us what I already
16 answered. It is exactly the same but I am happy to
17 re-state it. When we came into the administration
18 we had the 2018 report, the July 2018 report. As my
19 witness statement states, having reviewed the 2018
20 report, I realised that we would benefit greatly
21 from more information and more expert advice on this
22 issue.

23 We created a team internally and we then
24 sought out the International Telecommunications
25 Union technical advice. They provided a number of

1 experts and they worked with our internal team and ³³⁶
2 with additional external domestic consultants that _{11:33}
3 we had. So through the process of this
4 multidisciplinary international and domestic team,
5 they started to consolidate information to create
6 recommendations and to bring options and say this is
7 the reason why we are recommending what we are
8 recommending.

9 As I said, it is a process, and there was
10 a lot of human hours behind this to be able to reach
11 the conclusion that we reached.

12 **MR BALDWIN:** So the answer that you gave
13 now, and we can look back, if you like, to the
14 answer you gave Mr González, I am not trying to
15 compare and see if it is different, that is not the
16 purpose of this, it is to be clear, but is that the
17 complete process?

18 You say it is a process and you describe
19 some things that happen. I am just trying to
20 understand whether that was the entire part of the
21 process, meaning that you engaged the ITU, you
22 engaged the experts, you had your advisory
23 committee. Was that the list of what you did or
24 what you considered when making that decision? I am
25 just trying to understand everything you considered.

1 **MS CONSTAÍN:** Could you maybe rephrase it? ³³⁷
2 **MR BALDWIN:** Okay. I would like to know, _{11:35}
3 you said you made the decision to have the tender
4 instead of renew the contract. I would just like
5 for you to tell us all the sources of information
6 you used to make that decision. That is the
7 question.

8 **MS CONSTAÍN:** So the sources of
9 information – the main source of information was
10 this multidisciplinary team. The sources that the
11 team used in all of their research I don't have all
12 that information. I can tell you that the task of a
13 task force like this one is precisely to collect
14 information, expert opinions, expert suggestions,
15 you know, and then bring it all together.

16 As Minister you have many different things
17 on your plate, so you can't do the deep dives that
18 you would do in other positions, so you rely very
19 much on technical expertise and the recommendations
20 of the teams or working groups that you create

21 **MR BALDWIN:** Do you remember – I am not
22 asking you for the names, it would be hard for you
23 to remember all the names – but do you remember the
24 roles that the people on this task force – I assume
25 the task force, you mean the advisory committee you

1 created? Or is that different? 338
11:36
 2 **MS CONSTAÍN:** No. The advisory committee
 3 was, let's say, one of the sources, but if you look
 4 the ITU for example is not in the advisory
 5 committee. The ITU is an external consultant. So
 6 we had several external consultants that worked
 7 together to bring information, to bring data, to
 8 bring recommendations, to bring international good
 9 practices so that we would be aware of what
 10 international good practices were in this area, and
 11 that internal let's say body of expertise worked
 12 together.

13 **MR BALDWIN:** Was .CO Internet or Neustar
 14 involved in that task force at all?

15 **MS CONSTAÍN:** No. The task force was
 16 created specifically to bring a recommendation with
 17 regard to whether a tender process or an extension
 18 would be the most optimal choice for the Colombian
 19 people and government. .CO Internet was the
 20 administrator of our domain name, and so in that
 21 role we remained our communication with them with
 22 regard to the contract, of course, but not with
 23 regard to the decision whether or not to extend the
 24 contract, because I would also think there would be
 25 an inherent conflict of interest there.

1 **MR BALDWIN:** Did the task force issue a 339
11:38
 2 collective report, or did the members of the task
 3 force each give you individual reports on their
 4 areas of expertise?

5 **MS CONSTAÍN:** The ITU report greatly
 6 integrates the conclusions of the multidisciplinary
 7 task force.

8 **MR BALDWIN:** And the multidisciplinary
 9 task force had technical people on it, right, that
 10 understood it? It had economic -- did it have
 11 economic groups on it?

12 **MS CONSTAÍN:** It had people who had
 13 expertise on the legal front, people who had
 14 expertise on the economic front, it had people who
 15 had international expertise. We had one of the ITU
 16 advisers was from Argentina, I remember the ITU
 17 brought someone in from Australia -- we would have
 18 to go back and look -- I apologise, I don't know the
 19 names of everyone that was there, but we can
 20 definitely get you a list of the people that
 21 participated in this process.

22 **MR BALDWIN:** But just to be clear there
 23 wasn't a collective report from the task force, from
 24 the various members that was given to you as a
 25 collective report? Like the ITU report you said

1 collected information from others on the task force, 340
11:40
 2 but there wasn't a collective report. Is that
 3 right?

4 **MS CONSTAÍN:** What I would say is I had
 5 the expert advice from the different members of
 6 these task forces. The ITU report was a very
 7 important reference for us and for me in making the
 8 decision, of course, and the teams worked in a
 9 co-operative and collective manner. So the ITU
 10 worked with our teams, both internal and external,
 11 and they reached the conclusions that they reached
 12 and the recommendations that they reached, which of
 13 course all were helpful to me in making the
 14 decision.

15 **MR BALDWIN:** I am going to ask you about
 16 the legal part of the task force, but to avoid
 17 Mr González making a speaking objection, I will tell
 18 you that I don't want you to tell me the advice that
 19 they gave you or any of that, but my question about
 20 the legal side of the task force is were the legal
 21 people involved as part of this task force, did they
 22 advise on Colombian law, regulatory law? What type
 23 of law did they advise on? What type of law were
 24 they looking at?

25 **MS CONSTAÍN:** The legal framework that

1 rules Colombia. 341
11:41

2 **MR BALDWIN:** Thank you.

3 You said that .CO didn't have any
 4 involvement with this task force. Does that mean
 5 that there weren't any operational or engineering
 6 things discussed with regard to the operation of the
 7 domain? The domain was being operated at that time
 8 by .CO Internet, so was there no input about the
 9 current operation of the domain, the .co domain in
 10 the task force?

11 **MS CONSTAÍN:** Let me try to make sure that
 12 what you are asking me is what I am going to answer,
 13 because it is not clear to me what the question is.

14 Did the task force look at operational
 15 aspects of the top-level domain including ours?
 16 I would say the answer is yes, they did.

17 **MR BALDWIN:** Did they look at the specific
 18 operation of the .co domain as opposed to just
 19 looking at all the country-code top-level domains?
 20 Did they look at the operation of .CO specifically?

21 **MS CONSTAÍN:** I wasn't there. You would
 22 have to ask them.

23 **MR BALDWIN:** They are not here either, but
 24 we will move on.

25 Now this task force, you said that is not

1 the advisory committee, just to reiterate that. The ³⁴²
2 task is not the advisory committee _{11:43}
3 **MS CONSTAÍN:** When you are in these
4 positions, you have let's say several sources of
5 expert advice. So the advisory committee is one,
6 but for example the ITU again does not sit on the
7 advisory committee.

8 **MR BALDWIN:** So can you tell me what the
9 difference then is between the advisory committee
10 and the task force? What different roles they
11 served in your decision-making process?

12 **MS CONSTAÍN:** Yes. The advisory committee
13 is a technical team created within the Ministry that
14 has a structure as such. I had advisers in several
15 areas, not just in domain, that were just that, were
16 advisers. They would provide information, create
17 documents, and submit, which is very different from
18 the role of a structured office within a Ministry.

19 **MR BALDWIN:** I would like to understand,
20 you said it was your decision, you signed it on
21 whatever date it was, I don't have it in front of
22 me, I will pull it up, but when you signed the
23 order, the decree or resolution, stating that there
24 would be a new tender, which would have foreclosed
25 the renewal, did you receive a recommendation from

1 either any individual members of the task force or ³⁴³
2 the collective task force to recommend, did they _{11:45}
3 recommend that it would be a tender instead of a
4 renewal of the contract?

5 **MS CONSTAÍN:** The 2018 report was the
6 first time that we got the recommendation to open an
7 international open tender. I would have to look
8 If you have the ITU report, we could maybe look at
9 it.

10 **MR BALDWIN:** Let's put the ITU report
11 aside. We have that in the record. You are right,
12 it says what it says. I am trying to get
13 information that we don't have, and that is why the
14 ITU report, you correctly point out, says what it
15 says, so we will exclude that. Outside of the ITU
16 report, did either the task force or the advisory
17 committee give you a recommendation regarding
18 whether to do a tender or a renewal of the
19 concession?

20 **MS CONSTAÍN:** I believe that within your
21 records you have the recommendation of the
22 committee. If you would like to take them out, we
23 could read them together.

24 **MR BALDWIN:** Which, the advisory
25 committee?

1 **MS CONSTAÍN:** Yes. ³⁴⁴
2 **MR BALDWIN:** And that was from what time _{11:46}

3 period, do you know?

4 **MS CONSTAÍN:** I do not, but if you have
5 them, it might have a date on there.

6 **MR BALDWIN:** We might come back to that.
7 We are going to move on here for just a moment.

8 Could you go to paragraph 13 of your
9 witness statement, please? 13 and 14, so maybe it
10 is better if you read both paragraphs.

11 **MS CONSTAÍN:** On 13:
12 "Specifically, the MinTIC internal team
13 and external advisers started to engage with the ITU
14 experts from early 2019, and carried out extensive
15 research and discussions regarding the future of the
16 .co domain and the recommended process for the
17 conclusion of a new contract."

18 14. "Quickly, it became apparent that it
19 could be far more beneficial to Colombia to launch a
20 new tender process and adopt new conditions for the
21 administration and operation of the .co domain.
22 This was because the preliminary market studies my
23 team carried out showed that compared to similar
24 ccTLDs the share of proceeds received by Colombia
25 was extremely low, and the average concession length

1 for these other ccTLDs was around four or five years ³⁴⁵
2 maximum. The ten-year extension permitted by the _{11:48}

3 2009 contract therefore did not represent standard
4 practice, all the more in a fast-paced environment
5 such as the internet industry (and the domain name
6 industry in particular). In addition, it became
7 apparent that the current model for the
8 administration and operation of the .co domain did
9 not reflect the needs of the Colombian State to take
10 a more active role both in the management of the
11 .co domain itself and vis-à-vis ICANN, in order to
12 participate in the discussions and negotiations of
13 international domain name policies and better
14 monitor industry standards".

15 **MR BALDWIN:** Just to be clear -- I didn't
16 want to interrupt you -- but if I ask you to look at
17 something, we all have it too, so it is more that
18 you read it and become acquainted. You don't have
19 to read it out loud, but I appreciate that, that was
20 good, but for the future

21 So I want to focus -- well, actually, in
22 paragraph 13, it states that "the MinTIC internal
23 team and the external advisers started to engage
24 with the ITU experts from early 2019." So prior to
25 2019 there was no engagement with the ITU or the ITU

1 experts. Is that correct? 346
11:50
 2 **MS CONSTAÍN:** Yes.
 3 **MR BALDWIN:** It is this word "quickly"
 4 I am interested in. You say "Quickly, it became
 5 apparent that it could be far more beneficial to
 6 Colombia to launch a new tender process". Do you
 7 remember how quick "quickly" was?
 8 **MS CONSTAÍN:** No.
 9 **MR BALDWIN:** Mr Chairman, could we have a
 10 few seconds, please?
 11 **MS CONSTAÍN:** Mr Chairman, would it be
 12 okay for me to get a cup of tea or water?
 13 **PRESIDENT:** We will take a 5-minute break
 14 for anybody who wishes to get a cup of tea or cup of
 15 coffee.
 16 Ms Constaín, you are in the middle of
 17 giving evidence in this case. Please don't talk to
 18 anybody about this case while you are out getting a
 19 cup of tea.
 20 (Short break from 11.51 am to 11.55 am)
 21 **PRESIDENT:** Go ahead.
 22 **MR BALDWIN:** Thank you, Mr President.
 23 Ms Constaín, we talked about a -- in your bundle you
 24 have an exhibit, it is marked by exhibits, it is
 25 exhibit C-39, so if you could just pull that up,

1 precisely to bring in different voices to contribute 348
11:57
 2 to a decision-making process. So you don't
 3 necessarily, like there is no process that says
 4 I adopt or I reject a recommendation. They are just
 5 that, they are recommendations that provide you with
 6 context and you as the decision-maker take all the
 7 different elements that are given provided to you,
 8 and that is how a decision is made.
 9 **MR BALDWIN:** So my question, then, after
 10 that explanation would be when you received the
 11 recommendation from the advisory committee to go to
 12 tender, did you take any steps after receiving that
 13 recommendation before adopting the recommendation to
 14 do a new tender for a new concession?
 15 **MS CONSTAÍN:** Again, the decision to go to
 16 a new tender was executed on the day that I signed
 17 the decision.
 18 **MR BALDWIN:** Did you do anything after the
 19 recommendation? Do you recall doing anything -- and
 20 I am asking specifically in this case, not as a
 21 general matter. In this particular case, after you
 22 received the recommendation from the advisory
 23 committee to launch a new tender, did you take steps
 24 to determine whether that recommendation was
 25 appropriate before signing the official resolution

1 please. 347
11:55
 2 **PROFESSOR DERAINS:** Which tab?
 3 **MR BALDWIN:** The Cs are the first tab, so
 4 C-39 -- it goes by numbers.
 5 **MS CONSTAÍN:** I don't have a C-39.
 6 **MR BALDWIN:** So we will skip looking at
 7 C-39, I don't have it either.
 8 You testified before our quick coffee
 9 break that you received a recommendation from the
 10 advisory committee as to whether or not to do the
 11 tender or to renew the contract, correct?
 12 **MS CONSTAÍN:** Yes, that is accurate.
 13 **MR BALDWIN:** When you received that
 14 recommendation from the advisory committee, what
 15 steps did you take to determine whether to accept
 16 that recommendation or to reject that
 17 recommendation?
 18 **MS CONSTAÍN:** Let's take a step back and
 19 let's -- I want to share what a decision-making
 20 process looks like. In these types of very complex
 21 contracts and decisions, of which I had to take
 22 several, not just this one, you get a series of
 23 recommendations. There is normally not a sole
 24 source of truth, if you want to call it that way,
 25 and part of the due diligence that one does is

1 to launch the new tender and to adopt the 349
11:59
 2 recommendation?
 3 **MS CONSTAÍN:** Again, maybe I'm not
 4 expressing myself correctly, one does not adopt one
 5 recommendation or not. There is no legal proceeding
 6 in Colombia that says I have adopted or I have
 7 rejected; it is a series of -- you basically express
 8 the decision of the decision-maker in the legal
 9 document. So I received a series of
 10 recommendations, all of which came from expert
 11 opinions, both domestic and international, and it is
 12 the sum of the recommendations that in this case
 13 happened to have been mostly in the same -- all
 14 I guess -- in the same direction. It is the sum of
 15 the recommendations that I used to make the decision
 16 to open a new tender.
 17 **MR BALDWIN:** And you said International,
 18 some domestic, some international. International,
 19 you mean the ITU?
 20 **MS CONSTAÍN:** The International
 21 Telecommunications Union, yes. It is the
 22 international body that has supported many other
 23 governments, including the government of Colombia,
 24 in the designation for country-code top-level
 25 domain.

1 **MR BALDWIN:** Mr President, we have no more ³⁵⁰
 2 questions for Ms Constaín. _{12:01}
 3 **PRESIDENT:** Thank you. Mr González?
 4 **MR GONZÁLEZ:** We have no re-direct,
 5 Mr Chairman.
 6 **PRESIDENT:** Ms Constaín, thank you very
 7 much for coming to give evidence to us. That is the
 8 end of your examination and we appreciate your
 9 having come this far and also for your report.
 10 **MS CONSTAÍN:** Thank you, Mr Chairman,
 11 members of the Tribunal, and counsel on both sides.
 12 It has been a pleasure to meet you all, and if you
 13 have any questions, feel free to reach out.
 14 **PRESIDENT:** Don't offer that!
 15 **MS CONSTAÍN:** Thank you very much.
 16 **PRESIDENT:** Shall we proceed to our next
 17 witness or do you want to take a break now? It is a
 18 bit earlier than we had planned.
 19 **MR BALDWIN:** I think being noon we could
 20 probably take a break. We were obviously going to
 21 finish this witness before the end of the day so
 22 I would prefer to take the lunch break now. It is
 23 noon, so ...
 24 **MR GOUFFÈS:** That is fine with us
 25 **PRESIDENT:** By my watch it is 2 minutes

1 after. Let's meet again at 1 o'clock. ³⁵¹
 2 (Luncheon adjournment from 12.02 pm to 1.13 pm) _{12:02}
 3 **PRESIDENT:** Very good. We will proceed.
 4 LUISA FERNANDA TRUJILLO BERNAL
 5 (with the assistance of the Interpreters)
 6 **PRESIDENT:** Good afternoon. Is it
 7 Ms Trujillo Bernal?
 8 **MS TRUJILLO:** Yes.
 9 **PRESIDENT:** Mr Trujillo, you were here at
 10 the first session yesterday, so you know who we are
 11 as the Tribunal and you know the lawyers in the
 12 room. You have in front of you a piece of paper
 13 with a statement. Could you read that into the
 14 record, please?
 15 **MS TRUJILLO:** Yes, sir. I solemnly
 16 declare upon my honour and conscience that I shall
 17 speak the truth, the whole truth, and nothing but
 18 the truth.
 19 **PRESIDENT:** Thank you very much. We have
 20 one statement from you and it is dated 23 February.
 21 Can you confirm that everything you say in the
 22 statement is correct to the best of your knowledge
 23 and belief?
 24 **MS TRUJILLO:** The content is correct.
 25 However, I would like to say that in paragraph 11,

1 due to a typo, the year is not 2018 but rather 2019. ³⁵²
 2 There is a typographic error. It was the _{13:14}
 3 18 March 2019 when the meeting took place, and
 4 I went on maternity leave on 8 March 2019 but the
 5 rest of the content of the text is correct.
 6 **PRESIDENT:** Thank you. No other changes
 7 you want to make?
 8 **MS TRUJILLO:** No further corrections
 9 Thank you.
 10 **MS ORDOÑEZ:** Thank you, Mr Chairman.
 11 I will do the direct examination in Spanish.
 12 **Examination by the Respondent**
 13 by Ms Ordoñez
 14 **MS ORDOÑEZ:** Good afternoon, Ms Trujillo.
 15 Before the other side begins the cross-examination,
 16 would you be kind enough to describe to us your
 17 background, your experience, in particular what is
 18 relevant with respect to the .co domain?
 19 **MS TRUJILLO:** Of course. I have a degree
 20 from the University of Medellin, I left in 2006 and
 21 then I began to practise law. Then I did a Master's
 22 at the University of Los Andes in public law and
 23 I specialised in public administration. I have also
 24 worked for a number of companies until 2011 when
 25 I started to work for the Colombian government as an

1 adviser to general secretaries. From 2017 I am the ³⁵³
 2 Secretary-General, or have been Secretary-General _{13:16}
 3 for a number of entities, such as the
 4 Superintendency of Companies, the MinTIC, and
 5 currently I am the General Secretary for the
 6 institute responsible for evaluation of education in
 7 Colombia.
 8 And as Secretary-General I have led a
 9 number of bidding processes, I would say some 400.
 10 I have also managed technological assets, human
 11 resources, for the different entities for whom
 12 I have worked.
 13 **MS ORDOÑEZ:** Thank you. As
 14 Secretary-General of MinTIC you explain in your
 15 witness statement that you supervised the bidding
 16 process that involved the .co domain. Can you
 17 explain to us why MinTIC launched that process?
 18 **MS TRUJILLO:** Yes, of course. As the
 19 Secretary-General of the Ministry, it was my
 20 responsibility to lead all of the contractual
 21 processes pre, during and post contract, and then
 22 specifically in 2018 I joined the MinTIC. I did so
 23 accompanying Minister Constaín and I became aware
 24 that the domain contract would expire in 2020 and it
 25 was then necessary to examine what the best

1 alternatives would be in order for us to continue ³⁵⁴
2 with the .CO operations. _{13:17}

3 At the time we realised that we didn't
4 have the sufficient legal, technical and financial
5 resources available to us to make decisions and the
6 two alternatives we had before us were either to
7 extend the contract or to open up a new bid, and
8 this is why we decided to reach out to the
9 International Telecommunications Union, the ITU, for
10 them to provide us with expert information to best
11 inform our decisions.

12 **MS ORDOÑEZ:** In your witness statement you
13 also mention the legal principles that govern the
14 public procurement process. Could you please
15 explain how these were taken into account within the
16 context of the .co domain decision?

17 **MS TRUJILLO:** Yes, of course. These are
18 not only legal but constitutional principles. In
19 Colombia, these principles of public procurement are
20 compulsory. Those principles have to be abided by.
21 They include transparency, planning, and
22 competition, so during contractual processes and
23 when decisions have to be made about whether to
24 renew or not these contracts, it is important to
25 understand that you can't modify the basic elements

1 of the contract. If you were to do that it could ³⁵⁵
2 lead to disciplinary measures being taken. In this _{13:19}
3 case it would be me that would have to undergo
4 disciplinary processes.

5 So when we found ourselves faced with the
6 possibility of an extension to the contract, we had
7 to consider the very high legal risk. We could not
8 impact upon the principle of planning because it
9 would mean changing the financial conditions, and
10 also in the handover documents from one
11 administration to another it was made clear that
12 that was something that we couldn't do, and we
13 couldn't change the bases of the original contract.

14 Also, this necessarily affected the
15 principle of free competition because it would not
16 have granted other interested entities the
17 possibility to take part in the bidding process, as
18 well as the principle of planning because we would
19 have modified the conditions under which the 2009
20 Contract had been concluded.

21 **MS ORDOÑEZ:** So during the bidding process
22 – (speaker overlap) ...

23 **THE INTERPRETER:** I am sorry, that was a
24 conversation off mic.

25 **MR BALDWIN:** She is going to ask the

1 question again. ³⁵⁶
_{13:20}

2 **PRESIDENT:** You have a couple more
3 minutes, so ...

4 **MS ORDOÑEZ:** It is the last one.

5 So, given that you supervised the bidding
6 process, could you please tell us about the process,
7 how it unfolded, and what treatment was given to
8 Neustar/.CO Internet?

9 **MS TRUJILLO:** Well, the bidding process
10 was open, transparent, it was a public process.
11 Both the bidders, Neustar, .CO Internet, all of the
12 interested parties had the opportunity to review all
13 of the documents and they presented a number of
14 observations, many of which were taken into account
15 and incorporated into the final documents, so
16 I believe that the treatment was equal, respectful,
17 and we in fact followed a number of their
18 recommendations and observations, and that can be
19 seen in the final bidding document. In the tender
20 document.

21 **PRESIDENT:** Thank you. Just before you
22 start, Mr Baldwin, if I may, just for clarification,
23 something that you said, Ms Trujillo, you said "both
24 of the bidders, Neustar, .CO Internet, all of the
25 interested parties had the opportunity to review the

1 documents". You said "both of the bidders, Neustar, ³⁵⁷
2 .CO Internet". Were they both bidders? _{13:22}

3 **MS TRUJILLO:** No. They presented a joint
4 proposal.

5 **PRESIDENT:** Thank you. And the other
6 thing – I might have misunderstood this – you said
7 at one stage that you were the General Secretary of
8 institutions responsible for education, but in your
9 witness statement you say that since January 2022
10 you have been working as an adviser to the secretary
11 of government in Bogotá. What did you mean by
12 Secretary-General of education? Was that a role
13 that you played?

14 **MS TRUJILLO:** Mr President, when
15 I submitted my statement in February of 2022, at
16 that time I was an adviser to the secretary of the
17 government of Bogotá and now since September 2022
18 I am the General Secretary for the Colombian
19 institute that evaluates education

20 **PRESIDENT:** Thank you. Mr Baldwin, please
21 proceed.

22 **Cross-examination by the Claimant**
23 by Mr Baldwin

24 **MR BALDWIN:** Thank you. Good afternoon,
25 Ms Trujillo. I just want to ask, were you paid

1 anything to prepare your statement or to be here? ³⁵⁸
 2 Were you paid money to prepare your statement or be _{13:24}
 3 here?
 4 **MS TRUJILLO:** No.
 5 **MR BALDWIN:** Now, you started with the
 6 Ministry in your role as General Secretary in
 7 September 2018, correct?
 8 **MS TRUJILLO:** Yes.
 9 **MR BALDWIN:** And you ended your role
 10 in May 2020, correct?
 11 **MS TRUJILLO:** Yes. Correct.
 12 **MR BALDWIN:** Then why did you make the
 13 change from working at the superintendents of
 14 companies to going to MinTIC in September of 2018?
 15 **MS TRUJILLO:** Well, at that time there was
 16 a change of government, and I knew Minister Constaín
 17 and she invited me to work with her at the MinTIC,
 18 which I was very honoured to do.
 19 **MR BALDWIN:** And just to be clear, you
 20 briefly mentioned your maternity leave, but it was
 21 from March 2019, correct, until – you tell me when
 22 it started and ended. Let's do it that way.
 23 **MS TRUJILLO:** Between 8 March 2019 to
 24 26 July 2019.
 25 **MR BALDWIN:** So congratulations, by the

1 way. My youngest was born in July of 2019, so ³⁵⁹
 2 I know you still have a lot of things going on! _{13:26}
 3 So you, as you note in your witness
 4 statement, you weren't there when the decision was
 5 formalised to do the tender, correct?
 6 **MS TRUJILLO:** Yes. That is correct.
 7 **MR BALDWIN:** And you note that you also
 8 weren't there when the decision was taken to hire
 9 Durán y Osorio, the law firm?
 10 **MS TRUJILLO:** No, I wasn't at the Ministry
 11 at that time. You are right.
 12 **MR BALDWIN:** Do you know who selected
 13 Durán y Osorio?
 14 **MS TRUJILLO:** Yes. I know that during my
 15 maternity leave one of my deputies was tasked with
 16 being Acting Secretary-General. What I was told
 17 when I came back is that a number of law firms were
 18 considered, big law firms in Colombia, who met the
 19 requirements and who had no conflict of interest in
 20 the process, more importantly, and on that basis
 21 they decided to hire Durán & Osorio.
 22 **MR BALDWIN:** Who is "they"? That is what
 23 I am wondering, who actually makes the selection of
 24 the law firm in that case? Who actually decided
 25 Durán y Osorio?

1 **MS TRUJILLO:** As I said, I wasn't there at ³⁶⁰
 2 the time. The person who signed the contract was _{13:28}
 3 the Acting General Secretary at that time.
 4 **MR BALDWIN:** So when you were on maternity
 5 leave you were the General Secretary, so there was
 6 an interim General Secretary while you were gone?
 7 **MS TRUJILLO:** There was someone in charge,
 8 yes.
 9 **MR BALDWIN:** And that person took the
 10 title of General Secretary while you were on
 11 maternity leave?
 12 **MS TRUJILLO:** That person took over the
 13 function, so they were acting as Secretary-General
 14 during that period.
 15 **MR BALDWIN:** Understood. And tell me,
 16 just generally speaking, how would a law firm be
 17 hired by the General Secretary to do a task? What
 18 is the process? Do you reach out to law firms? Is
 19 there a publication made stating that work needs to
 20 be done? How is the process of hiring the law firm
 21 done?
 22 **MS TRUJILLO:** So in order to engage legal
 23 advisers, specialised legal advisers according to
 24 the public procurement law in Colombia, it goes this
 25 way. You have to make a call for proposals setting

1 out the specific requirements. There is a request ³⁶¹
 2 for a financial proposal, a set of requirements are _{13:29}
 3 set out, the needs and the obligations that have to
 4 be met are all set out so they can be considered,
 5 and then there is an objective process through which
 6 the best candidate that – the Secretary-General
 7 decides who is the best candidate and then the
 8 contract is entered into on the basis of the
 9 requirements and the proposals that are made.
 10 **MR BALDWIN:** Okay.
 11 You mentioned – you have a legal
 12 background, correct?
 13 **MS TRUJILLO:** Yes.
 14 **MR BALDWIN:** What areas do you have legal
 15 expertise in?
 16 **MS TRUJILLO:** Well, as I said, my
 17 experience since 2011 was mainly in the public
 18 sector, in different entities of the public sector.
 19 I have been in charge of different processes of
 20 legal tendering, public procurement, advisory
 21 services, and since I took office as
 22 Secretary-General it is not only the public
 23 procurement but also financial processes,
 24 administrative processes, and so on. And human
 25 talent also.

1 **MR BALDWIN:** Would it be fair to say that ³⁶²
2 your main legal background is in public law? ^{13:31}
3 **MS TRUJILLO:** Yes. That is correct.
4 **MR BALDWIN:** Do you have a background at
5 all in international law?
6 **MS TRUJILLO:** No.
7 **MR BALDWIN:** Going back to your starting
8 in September of 2018 at the Ministry, what was your
9 prior relationship with the Minister?
10 **MS TRUJILLO:** You mean prior to
11 September 2018? None.
12 **MR BALDWIN:** But you said she asked -- you
13 said that Ms Constain asked for you to come and work
14 for the Ministry. So how did you know her prior to
15 that? I didn't mean relationship in a formal way,
16 but how were you aware? How did she know to pick up
17 the phone and ask you to come over?
18 **MS TRUJILLO:** Well, I had met her during a
19 job interview because my name had been recommended,
20 and my resumé had been recommended through the
21 entity where I worked prior to that. Then we met a
22 little bit better while we were working together of
23 course in the Ministry.
24 **MR BALDWIN:** Let me ask this. Is it
25 common for the General Secretary of a ministry to

1 change when a new presidential administration ³⁶³
2 changes? ^{13:33}
3 **MS TRUJILLO:** Yes, of course.
4 **MR BALDWIN:** So would that be, in the
5 United States we would call those positions
6 appointed positions instead of career positions. So
7 the General Secretary is an appointed-type position
8 in the government?
9 **MS TRUJILLO:** In Colombia it is called
10 differently. It is a free appointment, a free
11 appointment and removal.
12 **MR BALDWIN:** And what about directors,
13 people that hold the title of director at the
14 Ministry. Are those people that typically stay with
15 the ministries, even when the presidential
16 administration changes? Or are those jobs given to
17 people that come in and are changed when the
18 presidential administration changes?
19 **MS TRUJILLO:** Well, not necessarily. That
20 is a decision of the new minister. He or she can
21 keep the same people, the same staff. That is a
22 minister's powers depending on the expertise and
23 experience that is needed.
24 **MR BALDWIN:** You mentioned you have some
25 background in human resource law, so just a question

1 for my understanding. Are there rules in Colombia ³⁶⁴
2 that prevent a person from being fired or ^{13:35}
3 terminated? Does a worker have protections? In
4 other words, are directors in any way protected as
5 employees from being fired without a reason? Or do
6 they serve purely at the pleasure of the minister?
7 **MS TRUJILLO:** In Colombia, there are three
8 forms of employment in public entities. The first
9 is the free appointment and removal, as I said.
10 Those are offices at the level of director, vice
11 minister, and some other jobs where a person can be
12 freely designed and freely fired. So the protection
13 there, well, we have two motives there, two reasons
14 for protection. For instance, for women, maternity
15 there is a protection there, and also it can be some
16 kind of protection for other reasons, but normally
17 those offices, the people can be appointed and
18 removed freely.
19 Then you have the career jobs, so there
20 there is the career protection, there is no change,
21 and then you have the provisional appointment that
22 is before the exams, before the public office exams.
23 **MR BALDWIN:** Switching topics here, were
24 you part of the advisory committee at MinTIC?
25 **MS TRUJILLO:** Of the advisory committee?

1 Of the domain? ³⁶⁵
2 **MR BALDWIN:** Yes. ^{13:37}
3 **MS TRUJILLO:** Yes, I was part of it. When
4 we started there were two specific needs. One was
5 to find experts, expertise in order to help us to
6 take the best decision. And the second one was to
7 create an advisory committee, an advisory committee
8 that would be able to review and examine and take a
9 decision about the new operation of the domain, or
10 general operation of the domain, general.
11 In 2018 we decided to modify the
12 composition of that committee. I was part of that
13 committee, the Vice Minister was also part of it,
14 the director who was in charge of the process. The
15 senior legal officer and economic officer also, and
16 the General Secretary. We were part of that
17 advisory committee.
18 **MR BALDWIN:** You said here -- let me get
19 you the exact language -- you said here in 2018 --
20 this is what you just said -- "In 2018 we decided to
21 modify the composition of that committee". Who is
22 "we"?
23 **MS TRUJILLO:** We decided. So the "we",
24 well, we were the persons who were in charge of the
25 main process, so I was the Secretary-General and

1 I had to lead all the contractual processes. Then ³⁶⁶
 2 we had the director who was in charge of the ^{13:39}
 3 operation implementation and execution of the
 4 domain. Then the Vice Minister who was also in
 5 charge of that implementation and implementation of
 6 public policies concerning administration and
 7 management of the domain. I think that is all.
 8 I don't recall if there was somebody else but
 9 I think we were the key people

10 **MR BALDWIN:** You said "we" decided, so did
 11 all of you decide together to change the
 12 composition, or was it a decision of
 13 Minister Constaín?

14 **MS TRUJILLO:** The final decision was a
 15 decision of Minister Constaín. However, all her
 16 advisers, all her staff, all her working team
 17 recommended to do it because it was necessary. It
 18 was necessary to have that kind of collective group,
 19 collective task force or advisory group in order to
 20 take the best decision.

21 **MR BALDWIN:** Was that recommendation made
 22 in writing to Minister Constaín? Or was it made
 23 orally?

24 **MS TRUJILLO:** There was an oral
 25 recommendation, and I am sure if we review the

1 resolution you will find there the recommendations ³⁶⁷
 2 and the approval of the person who had prepared the ^{13:40}
 3 administrative act.

4 **MR BALDWIN:** If you could turn to
 5 paragraph 9 of your witness statement, which you
 6 should have in front of you, do you have it?

7 **MS TRUJILLO:** Yes, I do.

8 **MR BALDWIN:** In the last sentence you
 9 write, and I will be reading the English:
 10 "Therefore, the 2009 contract was no longer
 11 appropriate under the new circumstances (both in
 12 terms of its financial conditions, due to the
 13 excessively low share of the fees granted to
 14 Colombia, as well as in terms of its technical
 15 conditions and the operating model itself)."

16 I want to ask you about a part of that
 17 statement where you say that "it was no longer
 18 appropriate in terms of the technical conditions".
 19 What about "the technical conditions were no longer
 20 appropriate", in your view?

21 **MS TRUJILLO:** Well, I'm not a technical
 22 expert. However, the technical advisers of the ITU,
 23 for instance, in early 2019, as well as the advisers
 24 of the Ministry in general and the multidisciplinary
 25 task force that was created for that purpose started

1 to define the technical conditions of this contract, ³⁶⁸
 2 the one in 2009, and those technical conditions were ^{13:42}
 3 a little bit outdated, let's say. They had been
 4 prepared within a different framework. It was a
 5 different operating model of the domain worldwide,
 6 so it was important to adjust them to the new
 7 circumstances of the domain .com. But, as I say,
 8 I am not a technical expert, so I couldn't go
 9 further explaining which were the technical
 10 conditions that were no longer adequate.

11 **MR BALDWIN:** When you say the technical
 12 conditions, you mean the technical conditions set
 13 out in the 2009 concession?

14 **MS TRUJILLO:** It was not that the
 15 conditions were modified; it was the context. It
 16 was the framework under which the domains were
 17 operating in the world had changed.

18 **MR BALDWIN:** I am trying to understand
 19 what required a change because was there something
 20 in the 2009 concession where the terms of the
 21 technical conditions were no longer appropriate?

22 So you say here "the 2009 contract was no
 23 longer appropriate", and then "under the new
 24 circumstances", and then it says here in the
 25 parentheses "(in terms of the technical conditions

1 ...)." ³⁶⁹
 2 ^{13:44}

3 So I know you are not a technical person
 4 and I am not trying to ask you something that you
 5 don't know, but you wrote it in here so I am trying
 6 to ask what you meant when you wrote in here that
 7 "the technical conditions in the 2009 contract were
 8 no longer appropriate". Can you explain that to me?

9 **MS ORDOÑEZ:** I think she has answered the
 10 question.

11 **MR BALDWIN:** Could you please answer the
 12 question?

13 **MS TRUJILLO:** If you read the whole
 14 paragraph, and I will read it in Spanish and we will
 15 see how I determined that "in early 2019, as ITU
 16 experts on the internal MinTIC team moved forward
 17 with the analysis of the .co domain and domain name
 18 market conditions, it became clear that it might be
 19 more beneficial for Colombia to structure a new
 20 tendering process: Since 2009, both the domain name
 21 market and international best practices for
 22 operating ccTLDs had evolved considerably.
 23 Therefore, the 2009 contract was no longer
 24 appropriate under the new circumstances (both in
 25 terms of its financial conditions, due to the
 excessively low share of the fees granted to

1 Colombia, as well as in terms of its technical ³⁷⁰
 2 conditions and the operating model itself)". _{13:46}
 3 So when I am talking here about the
 4 technical conditions, usually you have in any
 5 contract technical, financial and legal components,
 6 and all of them had to be updated, taking into
 7 account the new circumstances of the market
 8 worldwide.

9 **MR BALDWIN:** If you move to paragraph 10,
 10 you state in this first sentence, "In addition, we
 11 also began to identify potential legal risks
 12 associated with renewing the 2009 contract. To us,
 13 it was clear that it was only a possibility for the
 14 parties to renew the contract, and not an
 15 obligation, as automatic renewals are prohibited
 16 under Colombian law".

17 Do you see that?

18 **MS TRUJILLO:** Yes, I do.

19 **MR BALDWIN:** Was .CO Internet asking for
 20 an automatic renewal of the 2009 concession?

21 **MS TRUJILLO:** No, and that was not
 22 feasible under Colombian law. That is just not
 23 possible. So there is no right to do that, or to
 24 ask for that.

25 **MR BALDWIN:** And you state in the

1 beginning part of that that "we" -- I never know who ³⁷¹
 2 "we" is but I assume you mean yourself -- "began to _{13:48}
 3 identify potential legal risks associated with
 4 renewing the contract".

5 When did you begin to identify these
 6 potential legal risks associated with renewing the
 7 contract?

8 **MS TRUJILLO:** Well, since a moment --
 9 because any time you have the possibility of
 10 renewing a contract, there may be always legal risks
 11 concerning upholding constitutional principles. So
 12 if we have to change something as essential, as
 13 fundamental, as the fees, as a share of the fees, so
 14 there was a very major modification in the tendering
 15 process that was carried out in 2009, that was a
 16 major modification to introduce, and there could be
 17 some kind of infringement of the principle, of the
 18 planning principles, and also of the free
 19 competition and competitiveness principle. That is
 20 the idea that other bidders could have been
 21 prevented from making offers, and also the
 22 transparency principle, because if there was a
 23 direct hiring or a direct contract, maybe that
 24 principle could also have been infringed. Those
 25 were the legal risks.

1 **MR BALDWIN:** So when you say "we also ³⁷²
 2 began to identify potential legal risks", instead _{13:49}
 3 what really is the case is you were always aware of
 4 those potential legal risks that could come with the
 5 renewal of a concession, right?

6 **MS TRUJILLO:** No, I don't think so.
 7 I think that was one element of the analysis that
 8 was necessary during those first months when we took
 9 office, but we had not yet identified what was the
 10 best decision for the Colombian state.

11 **MR BALDWIN:** Okay. So you stated that
 12 automatic renewals are not possible under Colombian
 13 law, correct?

14 **MS TRUJILLO:** Yes. That is correct.

15 **MR BALDWIN:** And then you state here in
 16 paragraph 10, in the third sentence of paragraph 10,
 17 you say "any extension of the 2009 contract would
 18 have to be negotiated". Is that correct?

19 **MS TRUJILLO:** Yes, that is correct,
 20 because the renewal could not have been automatic in
 21 any case.

22 **MR BALDWIN:** Okay. And that would apply
 23 to any entity with a contract or concession with the
 24 government? None of them could be automatic?

25 **MS TRUJILLO:** That is right.

1 **MR BALDWIN:** Paragraph 11 says, with the ³⁷³
 2 correction that you went on maternity leave on _{13:51}
 3 8 March 2019. When you went on maternity leave on
 4 the 8 March 2019, were you aware that .CO Internet
 5 would not get a renewal of its contract, and that
 6 there would be a new tender for the .co domain?

7 **MS TRUJILLO:** No, I was not aware of that.
 8 The decision had not been taken.

9 **MR BALDWIN:** Did you learn it only when
 10 you returned from maternity leave?

11 **MS TRUJILLO:** Yes, of course. I had been
 12 part of all the analysis since I arrived to the
 13 Ministry, since I joined the Ministry, and until the
 14 moment when I went on maternity leave. So the
 15 decision was taken while I was away on maternity
 16 leave, so I came back in July and then yes, of
 17 course, I learned all that had happened in the
 18 meantime.

19 **MR BALDWIN:** Okay. I would like to again
 20 just briefly change topics. Are you aware --
 21 actually this question first because it might save
 22 time -- are you aware of the Federal Communications
 23 Commission in the United States? Do you know what
 24 the Federal Communications Commission does?

25 **MS TRUJILLO:** No, I don't.

1 **MR BALDWIN:** I will go the longer way, ³⁷⁴
 2 then. Radio broadcast – regulation of radio ^{13:53}
 3 broadcast in Colombia, does it fall under MinTIC or
 4 does it fall under another Ministry of Colombia?

5 **MS TRUJILLO:** The radio broadcasting
 6 policy is under the Technology Ministry, yes. Ours.

7 **MR BALDWIN:** And is the same true of
 8 television broadcast, not other forms, but the
 9 broadcasting of the television signal? Does that
 10 fall under MinTIC as well?

11 **MS TRUJILLO:** Yes.

12 **MR BALDWIN:** Are there regulations in
 13 Colombia, or laws in Colombia, that would prevent
 14 someone from just starting a broadcast TV channel,
 15 and just doing it without the government permission?
 16 Does the government control what entities can use
 17 different frequencies and different channels for TV
 18 and radio?

19 **MS TRUJILLO:** Well, there are some
 20 specific requirements, but I don't see the link with
 21 what we are talking about, because really I don't
 22 have here in front of me the regulations, you know,
 23 to recall exactly what are the rules in Colombia.

24 **MR BALDWIN:** But being the General
 25 Secretary, having been the General Secretary of

1 MinTIC, all I am asking is if somebody wants to open ³⁷⁵
 2 up a radio station and broadcast on a radio ^{13:55}
 3 frequency, do they have to get some approval or
 4 permission or licence from MinTIC to be able to do
 5 so?

6 **MS TRUJILLO:** The General Secretary was
 7 not in charge of establishing procedures concerning
 8 telecom services, because for that more specifically
 9 you have another department, have you the Vice
 10 Minister for the connectivity and the directorate of
 11 communications, so those were the departments that
 12 established the procedures and requirements for
 13 radio or TV or broadcasting or any other telecom
 14 services, and none of those procedures or works or
 15 concessions that are linked with those telecom
 16 services – none of them went through our General
 17 Secretariat. They remained within the technical
 18 vice-ministry, which was the Vice-Ministry of
 19 Connectivity.

20 **MR BALDWIN:** Okay. Moving on to a
 21 different topic, could you go to paragraph 19 of
 22 your witness statement, please? And just take a
 23 moment to read that to yourself. (Pause)

24 I wanted to focus on the first sentence
 25 but the last part of the first sentence where you

1 state that "the firm Durán & Osorio had already been ³⁷⁶
 2 hired to assist with the structuring of the process, ^{13:57}
 3 and in particular to ensure that the ITU experts'
 4 recommendations were included in the draft terms of
 5 reference in compliance with Colombian law"

6 My question is you note that that is a
 7 particular thing that Durán y Osorio would do. So
 8 I take it from that that Durán y Osorio is the
 9 entity that drafted the terms of reference
 10 originally?

11 **MS TRUJILLO:** No. The legal component in
 12 the terms of reference were drafted and supported
 13 and advised by Durán & Osorio. As concerns the
 14 financial and technical parts, it was drafted by the
 15 ITU experts. However, if we are talking of the
 16 hiring of GACOF as financial consultant, that was
 17 specifically because Colombian law establishes that
 18 the drafting of technical conditions and legal
 19 conditions and financial conditions, that drafting
 20 must be objective, must not be subject to
 21 interpretation and cannot be of a general nature.
 22 So we needed that those recommendations of the ITU
 23 experts be harmonised with the rules of the public
 24 procurement law in Colombia.

25 **MR BALDWIN:** I am just trying to

1 understand that sentence, just so I can understand ³⁷⁷
 2 what you meant, because it says that Durán & Osorio ^{13:59}
 3 had been hired in particular to ensure that the ITU
 4 recommendations were in the terms of reference. So
 5 who took the ITU's recommendations and drafted them
 6 into the draft terms of reference? Was it somebody
 7 in the Ministry?

8 **MS TRUJILLO:** So as regards the
 9 structuring of a major process like that, you have
 10 an interdisciplinary task force, so you have
 11 internal experts, and obviously civil servants from
 12 the Ministry. You also have external consultants,
 13 Adriana Arcila, for instance, Lucas Quevedo. There
 14 was also the director, the Vice Minister. I was
 15 myself part of it, so it was a multidisciplinary
 16 task force with internal and external experts. And
 17 there is not only one person who is responsible,
 18 because there, in any terms of reference, you have
 19 the legal, the financial and the technical
 20 components, so you need a multidisciplinary task
 21 force.

22 **MR BALDWIN:** As somebody who has written a
 23 lot of documents, was there one person in charge of
 24 drafting the document, or did different groups draft
 25 the document and then it was combined together into

1 one document? 378
14:01
 2 **MS TRUJILLO:** Yes. That is correct. So
 3 the persons in charge of the structuring ensure that
 4 the three components are present but in a harmonised
 5 way. So we have a ToR which maybe harmonious and it
 6 can be published and released for the consultation
 7 of potential bidders, or interested parties
 8 **MR BALDWIN:** Thank you. Could we turn to
 9 paragraph 20 of your witness statement, and I will
 10 give you a moment to read that to yourself. (Pause)
 11 So there is a sentence that in the English
 12 is the last half of that paragraph, it says, where
 13 you write: "Particularly, on the technical side,
 14 I understand that the general approach was to
 15 include quite high requirements in order to ensure
 16 that the future operator would have the necessary
 17 experience and infrastructure to ensure the smooth
 18 operation of the .co domain, one of the largest
 19 ccTLDs worldwide".
 20 I have a few questions about that. One is
 21 do you know whose decision it was to include "high
 22 requirements"? Was this the ITU's decision? The
 23 Ministry's decision?
 24 **MS TRUJILLO:** Well, the requirements were
 25 set by the ITU experts. It was the ITU experts who

1 recommended what the technical conditions that had 379
14:03
 2 to be met should be. The operator of one of the
 3 world's biggest domains had to have very high
 4 qualifications in order to guarantee they could
 5 provide the service and manage the .co domain
 6 **MR BALDWIN:** So the recommendations from
 7 the ITU as to the requirements, are you stating that
 8 they were just accepted as is? In other words, the
 9 Ministry just took whatever the ITU said and put
 10 those into the draft terms of reference, rather than
 11 determining whether those were appropriate?
 12 **MS TRUJILLO:** I understand that the
 13 technical experts did evaluate them, and you have to
 14 remember by training I have knowledge about legal
 15 aspects. I understand that the recommendations were
 16 analysed and adapted to Colombia's specific
 17 situation, and this was finally reflected in the
 18 draft terms of reference that were published in
 19 November so that the experts in the market and the
 20 operators who might have been interested in taking
 21 part could submit their observations and comments.
 22 **MR BALDWIN:** So it is your understanding
 23 that at least some of the recommendations from the
 24 ITU regarding the requirements for the tender were
 25 adapted in the draft terms of reference as it was

1 originally published? 380
14:05
 2 **MS TRUJILLO:** I don't fully understand
 3 your question.
 4 **MR BALDWIN:** You said that the technical
 5 experts – when you said "the technical experts
 6 adapted", reviewed and adapted the recommendations
 7 from the ITU, you mean technical experts at the
 8 Ministry?
 9 **MS TRUJILLO:** Yes. Technical experts from
 10 the Ministry. Insofar as the ITU are external
 11 advisors, and finally it was up to the General
 12 Secretary to take the decision. Therefore, those
 13 recommendations were analysed by the technical part
 14 of the Ministry, specifically by the Directorate and
 15 the Vice Ministry.
 16 **MR BALDWIN:** And you stated that you don't
 17 have -- certainly you don't have the technical
 18 expertise like the technical experts do and the
 19 Ministry, but yet you were in charge of the tender.
 20 So did you accept what the technical expert said or
 21 did you do independent review yourself to determine
 22 whether or not those recommendations were
 23 appropriate?
 24 **MS TRUJILLO:** I led the contractual
 25 process. That does not mean that I deep-dived into

1 all of the different components because it is 381
14:07
 2 impossible to have technical, financial and legal
 3 expertise all wrapped up in one person. That is the
 4 reason why I, as an expert in contracts and leading
 5 public procurement processes, I was surrounded by
 6 experts in technical and financial matters so that a
 7 decision could be taken as an interdisciplinary team
 8 to publish the draft terms of reference of the
 9 tender.
 10 **MR BALDWIN:** If you look at this last
 11 sentence of paragraph 20, you state: "However, we
 12 never sought to favour a specific operator; to the
 13 contrary, we also wanted to ensure that the process
 14 would be competitive, and that various interested
 15 companies would be interested in participating".
 16 So was the goal with the terms of
 17 reference to try to have as many companies as
 18 possible submit bids?
 19 **MS TRUJILLO:** To attract the largest
 20 number of companies that had the legal, financial
 21 and technical expertise in order to operate .com,
 22 was the purpose.
 23 **MR BALDWIN:** And do you recall how many
 24 qualified bidders, how many bidders that qualified,
 25 bid for this concession?

1 **MS TRUJILLO:** There were three bidders who 382
2 submitted proposals. 14:08
3 **MR BALDWIN:** But only two of them were
4 qualified bidders, one was excluded. Isn't that
5 right?
6 **MS TRUJILLO:** In the first round they were
7 excluded because they didn't submit a guarantee
8 policy, and so that just left two bidders.
9 **MR BALDWIN:** Do you know if .CO Internet
10 as the entity that had been operating the domain for
11 ten years, do you know if .CO Internet was involved
12 in discussions about technical requirements or other
13 issues relating to the operation of the .co domain
14 as part of the tender process?
15 **MS TRUJILLO:** As part of the tender
16 process, .CO Internet was involved on several
17 occasions and several times, both for the
18 preliminary and the final document, they submitted a
19 number of observations that were taken into
20 consideration under the same conditions as other
21 proponents.
22 **MR BALDWIN:** And these were comments to
23 the draft terms of reference and then revised terms
24 of reference, correct?
25 **MS TRUJILLO:** Yes, that is correct. So to

1 the draft and the final version of the terms of 383
2 reference. 14:10
3 **MR BALDWIN:** But in the process of the
4 drafting of the first terms of reference, and the
5 preparation of information relating to the tender
6 before the first draft terms of reference was
7 released, was there any consulting-- were there any
8 discussions with the entity .CO Internet that had
9 been operating the domain for ten years, were there
10 discussions with them to help identify what issues
11 would be important for the operation of the
12 .co domain?
13 **MS TRUJILLO:** No, of course not. That
14 would have given way to a conflict of interest,
15 because they would have had a direct interest in the
16 bidding process, and in March we had decided to open
17 that process. Had we involved .CO Internet, it
18 would have been quite likely that there would have
19 been a conflict of interest and that would have
20 prevented them from taking part in the whole
21 contractual process.
22 **MR BALDWIN:** Ms Trujillo, you have a
23 binder -- you should have a binder at your desk.
24 There are tabs in the binder and we are going to
25 open a tab, they go in order from C to R. If you

1 could open up tab C-0084. 384
2 14:12
3 I see they are in reverse order so they
4 start with the higher numbers first, but we are
5 opening up C-0084. And if you look at the fourth
6 paragraph of that letter, in the Spanish it is the
7 fourth paragraph, in the English it is the fourth
8 paragraph on the second page. The English for those
9 following along in English it is the bottom of the
10 page of page 1, but for the Spanish it is the fourth
11 paragraph on page 2. Just take a moment to read
12 that for yourself.
13 **PRESIDENT:** For convenience can you read
14 that into the record, please?
15 **MR BALDWIN:** I sure will. I will read the
16 English into the record though, Mr President, if you
17 don't mind. It says: "It should also be noted
18 that, from the Ministry's perspective, the new
19 selection process is in line with Colombia's
20 commitments under the United States TPA".
21 This is a letter you wrote after your
22 return from maternity leave and the date of the
23 letter is the 17 September 2019. Do you recall
24 writing this letter?
25 **MS TRUJILLO:** Yes, of course.
MR BALDWIN: And when you state in that

1 paragraph I have referred you to that "it should be 385
2 noted that from the Ministry's perspective the new 14:14
3 selection process is in line with Colombia's
4 commitments under the United States Trade and
5 Promotion Agreement", do you recall what you did to
6 confirm that the position of the Ministry was in
7 line with the United States' Trade Promotion
8 Agreement?
9 **MS TRUJILLO:** I am afraid you can't just
10 read that out of context. That has to be understood
11 from the point of view of the whole text. You can't
12 take it out of context, I mean.
13 **MR BALDWIN:** Why don't you then read the
14 rest of that whole letter and then I can ask the
15 question again. If you need more context from the
16 letter, please read the rest of the letter and then
17 we will go back to that question. Just let me know
18 when you are ready. (Pause)
19 **MS TRUJILLO:** Okay. Do you want me to
20 read it to you?
21 **MR BALDWIN:** No, no, I am sorry. I do not
22 mean interrupt you. I never try to interrupt
23 anybody. Just can just read it for yourself.
24 **MS TRUJILLO:** I can read the whole thing,
25 then?

1 **MR BALDWIN:** Yes, but you can read it to ³⁸⁶
2 yourself. We all have the letter so you don't have ^{14:16}
3 to read the whole letter out loud but you can read
4 it to yourself. I understand that you said we had
5 to understand that line, that sentence, from the
6 context of the rest of the letter. I took that to
7 mean that you needed to read the rest of the letter
8 to be able to answer that question. Is that right?
9 **MS TRUJILLO:** Because you are just
10 referring to that paragraph, I am suggesting that
11 perhaps I should read the whole letter so that you
12 can understand the full context.
13 **MR BALDWIN:** Yes, I think that is a great
14 idea. I was just saying you can read the letter to
15 yourself, you don't have to read it out loud. So
16 I will give you time to read the entire letter.
17 **PRESIDENT:** You look a little bit confused
18 of what you are being asked. Could you put the
19 question again, please?
20 **MR BALDWIN:** Sure. The question again is,
21 and I will read the line that is relevant, because a
22 little time has passed.
23 **PRESIDENT:** No, I didn't mean that. So
24 the witness can actually look at this, if she needs
25 to read the document she can read it certainly, but

1 let's have the question specifically of what you are ³⁸⁷
2 asking her to answer. ^{14:17}
3 **MR BALDWIN:** I will read the question back
4 that I asked before, which is this line where it
5 says at the fourth paragraph of page 2 in the
6 Spanish, "It should also be noted that from the
7 Ministry's perspective the new selection process is
8 in line with Colombia's commitments under the
9 United States Trade and Promotion Agreement".
10 My question is what did you look at, what
11 research did you do to determine that the Ministry's
12 selection process was in line with the US-Colombia
13 Trade Promotion Agreement?
14 **MS TRUJILLO:** Well, my concrete answer to
15 that is that there was equal treatment given to all
16 of the bidders, as far as I understand. I mean I am
17 not an expert on the Treaty either, but when I say
18 that it is in line with the commitments undertaken,
19 I am referring to the fact that everyone is treated
20 equally, it is an open process, and this was
21 something that .CO kept saying, that there was an
22 impact on the treaty, but in fact there was not a
23 greater impact because a level playing field was
24 guaranteed. As the letter says, there was no
25 promise of an automatic extension, nor were there

1 any preferential entitlements. So there was no ³⁸⁸
2 commitment to them to give them any preferential ^{14:19}
3 treatment, or to give them an extension. So that is
4 the answer that I was giving to your question.
5 **MR BALDWIN:** In preparation for this
6 letter, writing this letter and preparing this
7 letter, did you review the other renewals and
8 extensions that the Ministry had granted to other
9 contracting parties or concessionaires?
10 **MS TRUJILLO:** Well, it would make no sense
11 to do that, nor would it make sense to compare them
12 or undertake such an analysis. Because of the very
13 specific nature of the .co domain contract, it meant
14 it could only be compared with another .co domain
15 contract or a domain contract of such a nature with
16 other countries.
17 **MR BALDWIN:** Just one moment,
18 Mr President, if I may. 30 seconds. (Pause)
19 Mr President, that concludes our questions
20 for Ms Trujillo, and we thank her.
21 **PRESIDENT:** Thank you, Mr Baldwin.
22 **MS ORDOÑEZ:** I have no re-direct.
23 **PRESIDENT:** You have no further questions.
24 Ms Trujillo, thank you very much. We have
25 no further questions for you. That is the end of

1 your examination, and thank you for coming to give ³⁸⁹
2 evidence to us and for your witness statement. ^{14:22}
3 **MS TRUJILLO:** Thank you very much to the
4 President and members of the Tribunal, and thank you
5 everybody else.
6 (The witness withdrew)
7 **PRESIDENT:** Subject to what counsel say, I
8 would suggest we take a break and then we will come
9 back and see what else we need to do today in
10 advance of tomorrow.
11 **MR BALDWIN:** Thank you. That is good for
12 Claimant. Thank you, Mr President.
13 **PRESIDENT:** Let's break for -- it is now
14 just after twenty past -- let's try and be back by a
15 quarter to three. I make it almost 25 minutes past
16 two.
17 **MR GOUIFFÈS:** Mr Chairman, sorry, can
18 I say something? Just before the break, you are
19 saying that we need to stop and then see what we are
20 going to do tomorrow. You remember our concern the
21 first day, or actually a year ago which I mentioned
22 during my opening, that this would need a maximum of
23 two days, and we are almost a day and a half and we
24 are over.
25 We are not sure what would happen tomorrow

1 and I think it is important that within the Tribunal ³⁹⁰
2 you have time to discuss whether there should be ^{14:23}
3 anything tomorrow, because if it is to answer
4 questions from the Tribunal my partner,
5 Dan González, offered that, but if it is closing
6 submissions --

7 **PRESIDENT:** We have had a preliminary
8 discussion amongst ourselves. Tomorrow was
9 scheduled to be answering questions from the
10 Tribunal. We do have a few questions, but we are
11 presuming that you are going to want to file
12 Post-Hearing Briefs. Is that your intent on both
13 sides?

14 **MR GOUIFFÈS:** That is correct,
15 Mr Chairman. That was my point.

16 **PRESIDENT:** Mr Baldwin?

17 **MR BALDWIN:** We had talked previously with
18 the parties about either doing closing submissions
19 or Post-Hearing Briefs. I think that our preference
20 would be to do closing submissions, but I think our
21 preference in any case is to do closing submissions
22 even if there are Post-Hearing Briefs, but we think
23 closing submissions in lieu of Post-Hearing Briefs
24 would be appropriate.

25 **MR GONZÁLEZ:** Just to be clear, when

1 counsel says that the parties discussed, that ³⁹¹
2 doesn't mean the parties agreed, so just to be ^{14:24}
3 clear --

4 **PRESIDENT:** I am not sure that Mr Baldwin
5 said there was agreement. The point is this. We
6 have tomorrow which is reserved. It is there if we
7 need it. We have a few questions. They can be
8 addressed while we are here, if that is helpful;
9 they can be addressed in writing. We are here to
10 help.

11 If counsel feel on both sides that it is
12 useful, then we can certainly deal with it -- hear
13 some answers from you. If you are in a position
14 that you would like to make closing statements and
15 you are ready to do so, we are here to listen to
16 them and they will be on the record.

17 This case has been quite extensively
18 briefed. If we are to have Post-Hearing Briefs,
19 again, we haven't made a decision between the three
20 of us, we have talked about trying to give you some
21 guidance, not to have another pleading that repeats
22 everything that is there, but rather a pleading that
23 would probably say here are our main points and to
24 see it, look at the claims, look at the submissions,
25 look at the transcript, if it is relevant, look at

1 these documents, and giving us some kind of a ³⁹²
2 roadmap towards the decisions we are going to have ^{14:26}
3 to make and presumably people on both sides with the
4 decision that you would like us to make.

5 That is the kind of thing. We have not
6 reached a decision. I am telling you basically what
7 we have talked about between ourselves if we were
8 giving you guidance. The idea was now that we
9 thought if we were going to meet tomorrow we would
10 give you an indication for you to make your
11 submissions as you wish, what you feel you want to
12 tell us, and we would give you a few questions on
13 which we have already discussed we would like some
14 guidance.

15 **MR GONZÁLEZ:** If I may be heard,
16 Mr Chairman, I think that is perfectly acceptable to
17 the Respondent. I think that is in fact why we
18 invited earlier today that we would love to have
19 questions from the Tribunal for two reasons, I think
20 you have hit on both of them, which is to the extent
21 that either/or both parties can address them
22 immediately tomorrow morning, so be it, and having
23 guidance today would be great. I suspect that some
24 of those questions may require the parties to
25 further brief them and we can do that in the post

1 closing brief. I think it is the only point of ³⁹³
2 disagreement I am hearing ^{14:27}

3 Our position is going beyond that, because
4 what I heard was doing closing submissions tomorrow
5 in lieu of the Post-Hearing Briefs and the concern
6 we have with that is this has been a very lopsided
7 one-sided case in the sense that only we have
8 presented witnesses and so therefore the notion that
9 we tomorrow have to have the last word that is going
10 to be said about the witnesses which were only our
11 witnesses that were heard would be improper, so what
12 we would like is the orderly process where tomorrow
13 we should address whatever questions can be
14 addressed and we are happy to do that from both
15 sides, I am sure, and then if Claimant should
16 submit, as is ordinary, their post closing brief
17 raising whatever points they want to raise from the
18 hearing and our three witness are represented and we
19 will respond to those, and certainly with the
20 guidance of the Tribunal as to how we should limit
21 that further.

22 **PRESIDENT:** I wouldn't accept that that is
23 the general way. Frequently Post-Hearing Briefs are
24 exchanged at the same time. We have heard and we
25 have listened to the evidence, we have read the

1 submissions both parties have given us, we have read ³⁹⁴
2 the witness statements before we heard the witness, ^{14:28}
3 so we understand – we think we understand where
4 both parties are coming from, and the only question
5 now is to give the parties the opportunity, should
6 they so wish, to address us on anything further. We
7 do not feel the need necessarily for a repetition.

8 **MR GONZÁLEZ:** Exactly.

9 **PRESIDENT:** So I understand what you are
10 suggesting, Mr González, is you would like to come
11 back tomorrow and address any questions we have.

12 Mr Baldwin, what is your position?

13 **MR BALDWIN:** I would like to take a short
14 break so I can confer with my colleagues and the
15 client before I give you my firm position, but I do
16 think we – you know, we were in a position where we
17 did our opening, then Respondent did their opening
18 We haven't had a chance – in the clarifications
19 there was not the opportunity to respond to that and
20 there was the witness testimony which can be used
21 for both sides. So I think our position is there
22 should be closings.

23 In terms of the Post-Hearing Briefs
24 I would like to confer with my colleagues, if
25 I could, on a break and we could come back. If you

1 intend to take a break anyway, it would be good for ³⁹⁵
2 me to – ^{14:29}

3 **PRESIDENT:** Let's take a break and let's
4 come back in 20 minutes. Let's make it 3 o'clock.
5 We will come back at 3 pm.

6 (Short break from 2.29 pm to 3.08 pm)

7 **PRESIDENT:** Very well. Let's just proceed
8 with where we go from here.

9 First of all, I am going to give you a few
10 questions which are issues that we have discussed
11 between ourselves and on which you may wish to
12 express a view, and we would like to have tomorrow
13 morning a session at which, if you are able to, to
14 address these questions, and also if you would like
15 to take a certain amount of time, maybe 30 minutes
16 each, to give us your closing remarks focusing very
17 much on the evidence and what we have heard over the
18 last day and three quarters.

19 **Tribunal Questions**

20 The questions that we have are the
21 following.

22 First, is there a hierarchy in the
23 jurisdictional objections or are they alternative?

24 Second, how do the parties respectively
25 consider the language of the contract" may be

1 renewed" is affected by the reference to "the ³⁹⁶
2 legislation in force at the time of the renewal"? ^{15:10}

3 Third question: what is the applicable law
4 to determine who is the proper Claimant in this
5 arbitration? And does the Tribunal have
6 jurisdiction to make an award against Neustar Inc?

7 Fourth question: what is the consequence
8 or effect of point 5 of the interim Request for
9 Relief presented before the Colombian Council of
10 State? That is exhibit R-80.

11 And the last question. What is the effect
12 on the parties' positions of .CO Internet SAS having
13 been assigned a new contract on 3 April 2020?

14 Then we are happy to have Post-Hearing
15 Briefs. We think there should only be one round,
16 simultaneous exchange. We would like again the
17 Post-Hearing Briefs to be focused on the evidence
18 that we have in the record and which we have had
19 over the last day and a bit, 20 pages maximum, one
20 and a half spacing, and 12 font. Of course
21 I haven't said anything about margins, but please
22 don't go to both edges of the page!

23 We will have the transcript, I presume,
24 just as we had yesterday's transcript late
25 afternoon, we will get the transcript for today

1 today, and tomorrow's transcript, and so if we were ³⁹⁷
2 to go 30 days from tomorrow – ^{15:13}

3 **MR GOUIFFÈS:** Sorry, Mr Chairman, just in
4 relation to that point, I think what we have here in
5 the Procedural Order No 1, at article 21.3, that
6 actually, it is written, that is why I am saying it,
7 before we get to that, we need to agree within 30
8 days of the receipt of the record and transcript
9 agree any corrections to the transcripts between
10 ourselves. So that would mean – I am just stating
11 this – that would mean we have 30 days from that
12 and then 30 days to do the post-hearing briefs. And
13 there is Spanish and English, yes so ...

14 **PRESIDENT:** If we are talking about a few
15 extra days –

16 **MR GOUIFFÈS:** No, we are talking of one
17 more month, then because we would start the
18 post-hearing briefs.

19 **PRESIDENT:** What have we provided for
20 there for agreeing the transcript?

21 **MR GOUIFFÈS:** It was article 21.3, and it
22 says "30 days of the later of the dates of the
23 receipt of the sound recordings and transcripts", so
24 that is why I am saying reasonably we need to work
25 on the basis of transcripts which have been agreed

1 according to this article in the PO, and therefore ³⁹⁸
2 if it is one month – it is in two months' basically _{15:15}
3 roughly.

4 **MR GONZÁLEZ:** And, Mr Chairman, I just
5 finished that process in another case, and that may
6 sound very ministerial. It is the reconciliation
7 between the Spanish and the English which actually
8 took up more time, and it actually prevented us,
9 both parties, we ended up having to go back to the
10 Tribunal to ask for an extension on the post-closing
11 briefs precisely because both parties underestimated
12 the time required to do that reconciliation.

13 **PRESIDENT:** I understand that.

14 **MR BALDWIN:** I would just say that I don't
15 know if we need to the two months' aspect of it, but
16 certainly if that is in the Procedural Order and we
17 are going to keep that time period, which sounds
18 like we may need to, the parties can still draft the
19 post-closing brief on the transcripts and then, if
20 there are changes, make those changes in the
21 post-hearing brief, so I don't think we need another
22 month because of that, but it certainly sound like
23 we would need some additional time for it.

24 **PRESIDENT:** One of the reasons I'd like to
25 put in shorter periods than longer is that we are

1 all aware of how busy people are as well as having ³⁹⁹
2 their own personal commitments, so if we have _{15:16}
3 something in the diary we all know that we have to
4 get something done within a certain period of time.
5 But if it is genuinely felt on both sides that we
6 have the time for the record of the hearing and for
7 the sessions and for the post-hearing briefs, we can
8 agree a 60-day period or a 30-day period after the
9 first period. Okay?

10 **MR BALDWIN:** Mr President, if I may?

11 **PRESIDENT:** Yes, please go ahead.

12 **MR BALDWIN:** I wondered if it might make
13 more sense -- I had time to confer with my
14 colleagues on closings and other things and we are
15 happy to do whatever the Tribunal wants, but
16 I wonder if it might make sense to answer the
17 questions in the Post-Hearing Brief, even if maybe
18 it meant it went from 20 to 25 pages. It is up to
19 you, but I wanted to raise that as a possibility.

20 **PRESIDENT:** I think we would prefer to
21 hear from you tomorrow. There may well be
22 questions. We may be a bit more active on questions
23 when you are making submissions which would enable
24 us to raise questions. In which case it may be
25 something that one or both parties will want to add

1 to in the post-hearings. So I think we would like ⁴⁰⁰
2 to go ahead with tomorrow morning in any event and _{15:17}
3 again, we suggest we keep it relatively short,
4 aiming at, say, 30 minutes' maximum, if you feel you
5 can deal with that. We are right here. We know the
6 issues, we have heard the witnesses, we have heard
7 the arguments, so it is really focusing on some of
8 these questions and if there is anything that is
9 particularly important, we have heard one or two
10 issues from you that have come up.

11 **MR GONZÁLEZ:** I am sorry, I want to ask a
12 point of clarification. 30 minutes' maximum with
13 regards to addressing the questions and anything
14 else that we may want to respond to in terms of a
15 rebuttal and being efficient and not repeating
16 ourselves from what has been heard today or this
17 week.

18 **PRESIDENT:** We are putting these timelines
19 down because we don't want to leave them wide open.
20 If it is felt that somebody needs an extra 5
21 minutes, you have seen the flexibility that we as a
22 tribunal are prepared to show, but we would like to
23 keep it relatively brief.

24 So we start at 10 tomorrow morning? Does
25 that work for you?

1 **MR GOUIFFÈS:** This works for us. ⁴⁰¹
2 **MR BALDWIN:** Yes. _{15:19}

3 **MR GOUIFFÈS:** Mr Chairman, if you were
4 about to finish, I think there is one point which we
5 need to discuss which is the security for costs
6 application, because we have discussed with our
7 colleagues on the other side. We have agreed we
8 would do our applications on the 14 April, which is
9 Friday in two weeks. Next week is Easter holiday in
10 Colombia -- everywhere, but in Colombia in
11 particular -- so on 14 April, and the other side
12 will have until 28 April to answer that application.

13 Where there has been a disagreement is we
14 want to make an application on everything and we
15 would put everything to the Tribunal as we had
16 understood we should do, and the other side, I will
17 let them speak for themselves, but they wanted just
18 to bifurcate basically these questions and have
19 first an exchange on whether we are even entitled to
20 have that security for costs, I don't know, and they
21 made an argument on this. I must say we disagree
22 entirely on this, but I will let them speak on this.

23 That wouldn't change the calendar we just
24 agreed but it changes the next steps for the
25 Tribunal, et cetera, and I am not sure I understood

1 really what their position was. 402
15:20
 2 **PRESIDENT:** Let me summarise what I have
 3 understood you have said. You are going to make
 4 an application for security for costs?
 5 **MR GOUIFFÈS:** Yes.
 6 **PRESIDENT:** And we can expect that
 7 14 April.
 8 **MR GOUIFFÈS:** Yes, correct.
 9 **PRESIDENT:** And then we are going to have
 10 a reply on 28 April. Is that correct?
 11 **MR BALDWIN:** A little nuance. We think
 12 because this goes back to July of last year, we
 13 think there is a question as to whether or not this
 14 issue has been waived having been brought up at the
 15 hearing as opposed to any point before then, and so
 16 we thought we would like to be heard on the issue of
 17 the waiver before we have to respond to a full blown
 18 security for cost application. So our thinking was
 19 we could do that first and that issue could be
 20 decided. We wanted to present that as an
 21 alternative.
 22 **MR GONZÁLEZ:** We are going to file on
 23 14 April. They are certainly welcome to respond
 24 however they wish, including asking the Tribunal for
 25 time and giving justifications for why they want to

1 bifurcate these issues. We of course don't agree 403
15:21
 2 with the circumstances that counsel has stated, but
 3 I don't think it is appropriate to ask the Tribunal
 4 now to decide to bifurcate. That should be part of
 5 their response to the application.
 6 We believe at this point we have waited
 7 long and hard, we have asked repeatedly through
 8 discovery, through other means, for this information
 9 and it has not been forthcoming. We were anxious to
 10 see if at least at the hearings we would get this
 11 information, but it has not been forthcoming and
 12 that is why we have been forced to make the
 13 application. The record is clear what has happened
 14 in the last two days. So we will make our
 15 application. If counsel likes to respond and
 16 suggests to the Tribunal a basis upon which they
 17 should bifurcate, then they can do so and the
 18 Tribunal can hereafter address these issues.
 19 **MR BALDWIN:** I keep having to respond to
 20 both, and let me respond to both again, counsel on
 21 the other side.
 22 It is obviously unworkable that we have a
 23 deadline to do a full response and we submit a
 24 partial response. That doesn't work
 25 But more fundamentally this question of

1 the financials or whatever else was asked at 9 pm 404
15:22
 2 last night, and you know we mentioned – I mentioned
 3 to Mr Laurent that Security Services is a private
 4 company so we have to have appropriate
 5 confidentiality things, but mentioned to him and
 6 I will reiterate here, we are happy to give him
 7 financial statements so he can make his
 8 determination, but to act like this has been that
 9 long coming when it came at 9 pm last night,
 10 I wouldn't accept that assertion at all. And
 11 I don't know which one is arguing this over there,
 12 but I think what we are asking, and it is the
 13 Tribunal's decision, but we wanted to mention it, as
 14 we think given that long time period, especially
 15 because the demand was made at 9 pm last night and
 16 we said we would provide financial statements, that
 17 I think there is a question as to whether or not
 18 there has been a waiver and we think it might be
 19 more judicial economy to answer that question first
 20 before getting into a full blown discussion on it.
 21 So that is the position of the Claimant
 22 **MR GOUIFFÈS:** Mr Chairman, if I may answer
 23 on this, we have made – you remember the
 24 circumstances in which change has been announced or
 25 introduced into this arbitration at the end of July

1 and after the document process, you will remember 405
15:24
 2 that. We actually have asked to this Tribunal, to
 3 the other side and then to the Tribunal, documents
 4 in relation to financial information, et cetera, and
 5 we have received absolutely nothing. So we were
 6 told today or yesterday we will get something. At
 7 the moment there is nothing on record.
 8 So the situation is simple. Yesterday we
 9 were told 135 will dispose of all the issues. That
 10 is not true. It is just a press release. Our
 11 position is very simple. We make an application for
 12 security for cost in two weeks' time, we do it in
 13 the normal way with all the questions, and then if
 14 they want to argue that we shouldn't be doing this
 15 and the Tribunal should dispose that there would be
 16 a bifurcation they can do it on 28 April but we
 17 can't be prevented from making that application in
 18 the circumstances I have just described
 19 **MR BALDWIN:** Just one last thing. Not to
 20 extend this any further except to point out that,
 21 Mr Laurent, it is clear in the transcript I didn't
 22 say "all issues", I said "some" of his answers are
 23 in there.
 24 But putting that aside, more important for
 25 this is that I agree, they can make the application

1 on the 14th, they can make a full application on the ⁴⁰⁶
2 14th, but I am talking about our response to it. _{15:25}
3 I would like to be able to be heard on the waiver so
4 that we don't have to make a full response to it and
5 we can be heard on the waiver position. That is our
6 position, not that they should be prevented from
7 making an application; I think they can make their
8 application.

9 **PRESIDENT:** You want to be heard on the
10 waiver when?

11 **MR BALDWIN:** I thought if they made their
12 application on the 14th we could be heard on the
13 waiver on the 21st. We had said the 28th, so I was
14 keeping with that for consistency purposes, but we
15 could be heard in response to that, or we could go
16 with the waiver issue first. If they say they are
17 going to make an application, we could address it
18 first, but we thought given that the dates had
19 already been discussed, the 14th and the 28th, that
20 they could do whatever they want on the 14th,
21 including making a full application if they want to,
22 but we would like to be heard on the waiver in
23 response to that application before doing an entire
24 response and having an entire proceeding about it.

25 Because this is something going back to

1 July, and they certainly did ask for documents and ⁴⁰⁷
2 the Tribunal I think granted some and denied some, _{15:26}
3 if I recall correctly. So it is not that we were
4 ordered to produce financial documents in July and
5 we haven't done it. So that is not the case, even
6 though that is the implication of what they are
7 saying.

8 So that is all. We have talked about this
9 enough, but I just wanted to rely what our position
10 is.

11 **PRESIDENT:** I think we can say the
12 following, and I haven't had a chance to talk to my
13 colleagues: 14 April we will expect or we will
14 anticipate there may be an application for security
15 for costs. We will talk amongst ourselves about the
16 reply, and give you that answer from our point of
17 view tomorrow morning.

18 Okay?

19 **MR GOUIFFÈS:** That is okay, Mr Chairman.

20 **PRESIDENT:** Good. Anything else we need
21 to talk about today? From Claimant's side?

22 **MR BALDWIN:** Nothing from Claimant's side

23 **PRESIDENT:** Respondent's side?

24 **MR GOUIFFÈS:** Just to be clear, tomorrow
25 morning – I repeat what my colleague Dan has said

1 before – we are expecting each side to have 30 ⁴⁰⁸
2 minutes answering the questions from the Tribunal, _{15:27}
3 whatever we want to say in 30 minutes roughly, give
4 or take 5 minutes and then that is it and so we may
5 have questions from the Tribunal.

6 **PRESIDENT:** What I would like you to do is
7 to prepare your submissions to us tomorrow morning
8 in 30 minutes. We are not going to hold you to 30
9 minutes if it goes to 35 minutes, but we don't think
10 it should be necessary to go very much longer, and
11 obviously we are not promising not to interrupt you.
12 Maybe not quite as bad as United States Supreme
13 Court judges, but we may well ask – it depends on
14 the way it is presented and our thoughts in the
15 morning – we may well have some discussions with
16 you, and if we are talking we won't hold that
17 against you.

18 **MR GOUIFFÈS:** That is fine. Understood,
19 Mr Chairman.

20 **MR BALDWIN:** Just one clarification. I
21 thought I understood and now I am not as sure. The
22 30 minutes is to answer the questions and then –
23 I don't call it a closing – but 30 minutes and if
24 there is anything to be added in to reflect on what
25 happened at the hearing the last couple of days

1 **PRESIDENT:** The intention was the 30 ⁴⁰⁹
2 minutes was to do both the questions and whatever it _{15:28}
3 is that you want to say after –

4 **MR BALDWIN:** And I agree with that.
5 I think it is a good idea. I wanted to make sure
6 that was the case. We very much agree with that
7 timeframe and that being the time

8 **PRESIDENT:** With that, thank you very much
9 for the last few days and we will adjourn until
10 tomorrow morning at 10 am.

11 **MR GOUIFFÈS:** Thank you, Mr Chairman.
12 (The hearing was adjourned at 3.29 pm)

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