

12 December 2025

GNSO Council Review of Dublin GAC Communiqué

TO: Tripti Sinha

Chair, ICANN Board of Directors

CC: Nicolas Caballero, GAC Chair

Dear Tripti,

On behalf of the GNSO Council, we are hereby transmitting to you the GNSO Council's review of the Dublin GAC Communiqué Issues of Importance following adoption by the Council at its 11 December meeting.

The GNSO Council's review of each GAC Communiqué is an effort to provide feedback to you, in your capacity as members of the ICANN Board, as you consider issues referenced in the Communiqué that we believe relate to policies governing generic Top-Level Domains. Our intent is to inform you and the broader community of gTLD policy activities, either existing or planned, that may directly or indirectly relate to advice provided by the GAC. The GNSO Council hopes that the input provided through its review of the GAC Communiqué will enhance co-ordination and promote the sharing of information on gTLD related policy activities between the GAC, Board and the GNSO.

Kindly,

Susan Payne
GNSO Chair

GNSO COUNCIL REVIEW OF ISSUES OF IMPORTANCE CONTAINED IN THE [ICANN84 GAC COMMUNIQUE](#)¹

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Latin Script Diacritics	The GAC understands that a dedicated Policy Development Process (PDP) on Latin script diacritics is underway to develop policy for gTLD strings that include diacritical marks and have ASCII-equivalent applications, reflecting how many Latin-script languages are written. Despite the PDP's progress, the GAC has learned that the PDP will not be completed in time to include its outcomes in the Applicant Guidebook (AGB). The GAC is of the view that the recommendations of this PDP should be part of the conditions governing the Next Round of New gTLDs. The GAC understands that there may be viable solutions to resolve this issue without	GNSO, LD PDP WG	Yes	The GNSO Council has initiated a PDP on this topic, to allow for a solution to provide a path for the delegation of ASCII/Latin diacritic sets, where no such solution existed before. The LD PDP is currently operating well ahead of its agreed upon timeline.	The GNSO Council believes that there are several elements that should be taken into consideration: • The LD PDP, currently still in process, is the proper mechanism to establish the policy recommendations around Latin diacritics. It is, therefore, unclear at this stage, what set of rules would govern the integration of Latin diacritics into the immediate Next Round. • The LD PDP WG has recognized that the policy recommendations produced from this PDP are to govern Latin diacritics issues for a longer term, not merely to align with the immediate Next Round. • Moreover, the Council, in initiating the LD PDP, did not anticipate that timing

¹ As per the ICANN Bylaws: 'There shall be a policy-development body known as the Generic Names Supporting Organization (GNSO), which shall be responsible for developing and recommending to the ICANN Board substantive policies relating to generic top-level domains.'

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	delaying the launch of the Next Round whilst providing proper notice to prospective applicants. The GAC requests the Board to work with the GNSO to ensure the integration of PDP recommendations into the application and evaluation processes of the Next Round of New gTLDs.				would allow for its inputs to be integrated into the immediate Next Round. This is evidenced by the work plan submitted by the LD PDP and agreed to by the Council, which indicated completion of the PDP well after the launch of the Next Round. • SubPro recommendations 3.6 and 3.7 acknowledge the possibility of policy work concurrent with an ongoing round, and that any policy outputs should only apply to the opening of the next round. • The Council has indicated in the past that its priority is a predictable launch date for the immediate Next Round. Therefore, in addition to the procedural considerations already described, the Council objects to potential delays to the launch of the Next Round. • The GNSO Council appreciates the GAC's and other parts of the ICANN Community's willingness to see these policies applied as soon as possible. After

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					ensuring this PDP is conducted following a very tight schedule, it will work with the Board and Org to ensure that no undue delays are created all the way through to Implementation.
IGO Protection s	The GAC takes note of ongoing discussions in the Subsequent Procedures Implementation Review Team and GNSO Council concerning the inclusion of reserved Intergovernmental Organizations (IGO) identifiers in the scope of String Similarity Evaluation in the Next Round of New gTLDs, in which applied-for strings are evaluated for string similarity against the list of reserved	GNSO Council	Yes	Following the receipt of the 16 September 2025 letter from the ICANN Board, the GNSO Council discussed this matter at an Extraordinary Council meeting in September and during its meetings at ICANN 84 in Dublin. Ultimately, during its	The GNSO Council notes the points raised by the GAC and acknowledges that the New gTLD Applicant Guidebook provides for various procedures, including Objections and GAC Advice, that could be brought against an applied-for gTLD string that could be considered confusingly similar to a Reserved Name. In its Motion, the Council further encouraged ICANN Org staff to take steps to inform both the GAC and relevant IGO/INGO organizations of relevant applied-for gTLD strings following String

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	strings. The GAC takes note of letters from the ICANN Board and the ALAC to the GNSO Council supporting this inclusion. Against the backdrop of the GNSO policy recommendations for the introduction of new gTLDs that applied- for strings must not be confusingly similar to a reserved name, and must not infringe existing legal rights, and the 2007 GAC Principles regarding New gTLDs that the introduction of new gTLDs must make proper allowance for rights in the names and acronyms of IGOs, the GAC continues to monitor this evolving topic, and anticipates further discussions and contributions following the ICANN84 Dublin Meeting.			November 2025 meeting, the Council passed a motion that confirmed that Reserved Name strings (including IGO/INGO identifiers) will not be included in the String Similarity Evaluation in the New gTLD Program.	Confirmation Day to facilitate the use of such procedures, if and as needed.

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Urgent Requests for Disclosure of Registration Data	Registries and registrars should be required to provide a swift determination and response to Urgent Requests for disclosure of registration data in circumstances that pose an imminent threat to life, of serious bodily injury, to critical infrastructure, or of child exploitation. The GAC notes action is still pending on its Advice in the ICANN79 San Juan Communiqué and its Follow-Up on Previous Advice in the ICANN80 Kigali Communiqué regarding the expeditious establishment of a policy on Urgent Requests for disclosure of domain name registration data. The GAC reiterates the importance of ongoing work on Urgent Requests in the two parallel tracks previously agreed by the GAC, the ICANN Board and the GNSO Council. The GAC expresses satisfaction with the progress achieved by the Registration Data Implementation	Reg Data IRT, GNSO Council	Yes	ICANN Org is seeking input from the community on the proposed timeline for Urgent Requests for Lawful Disclosure. One of the questions asked is whether the authentication mechanism (when available) would require additional policy work, or that the authentication mechanism is part of the implementation of Rec 18 and would not require additional policy work.	Considering the ongoing Public Comment on the topic of Urgent Request, the GNSO awaits the results thereof for further discussion by Council and therefore refrains from providing a definitive position on this topic at this point in time. The Council will review the outcomes of the Public Comment process before engaging in further discussion or decision-making. Following the conclusion of the Public Comment process, the GNSO Council will consider any necessary next steps or actions in accordance with established ICANN procedures.

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	Review Team (IRT) in the policy track on establishing a timeline to respond to Urgent Requests. The GAC notes the current proposal for a 24-hour timeline to address Urgent Requests, with potential extension to 72 hours in cases of force majeure, is in line with previous positions expressed by the GAC and the ICANN Board. The GAC intends to provide a submission to the recently opened ICANN Public Comment proceeding on the draft text for the Urgent Requests section of the Registration Data Policy, given the importance of this issue to the GAC. After the Public Comment proceeding, the GAC urges swift action to finalize the timeline. The timeline must be uniformly followed by the Contracted Parties to be fit for purpose based on the urgent scenarios involved. The GAC also suggests that support for Urgent Request submission should be				

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	integrated within the RDRS to optimize usage of resources. In the authentication track, the GAC welcomes the update it received from the PSWG regarding its ongoing efforts through the Practitioners Group to develop technical mechanisms to authenticate the identities of law enforcement requestors submitting Urgent Requests. The GAC does not believe new policy development is needed to allow for Urgent Requests to utilize the authentication mechanisms being developed by the PSWG for law enforcement requestors. Instead, usage of these mechanisms should be considered part of the implementation process for the existing Registration Data Policy. In this respect, the GAC appreciated the ICANN Board's statement during the bilateral meeting at ICANN84 that authentication mechanisms could be incorporated with				

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	no new policy development. The GAC encourages the Board and the GNSO Council to work together to identify the most effective path to swiftly integrate outcomes from the PSWG's work on authentication mechanisms in the policy on Urgent Requests. Since the authentication mechanisms are needed for the implementation of Urgent Requests policy, and those mechanisms are expected to require technical interfacing with ICANN systems, the GAC continues to appreciate the participation of ICANN staff and community members in the PSWG's Law Enforcement Authentication Practitioners Group. The GAC supports the PSWG's efforts and urges the necessary parties to continue prioritizing this work.				

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Registration Data Request Service (RDRS)	The GAC is of the view that ICANN should maintain a permanent and centralized mechanism to channel domain registration data requests to registrars, and registrar participation should be mandatory to ensure the usefulness of the mechanism for requestors. This mechanism should also require participation by privacy and proxy services affiliated with registrars. The GAC calls for efforts to ensure adequate and timely improvements to the RDRS to reassure the community that it can evolve into such a permanent, centralized, and globally accessible mechanism. The absence of an adequate centralized system creates inefficiencies, as requestors such as law enforcement agencies would need to approach each registrar independently.	RDRS SC, GNSO Council, ICANN Board	Yes	The RDRS SC has finished its Findings Report and published it for Public Comment (PC) in August 2025. During ICANN84, the SC worked on incorporating the PC into its Findings Report where necessary.	The RDRS SC Findings Report was presented at the November Council meeting. The Council will review the report and discuss the next steps during its December meeting.

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	The GAC provided a submission to the recent Public Comment proceeding outlining its views on the final report of the RDRS Standing Committee. In this submission, the GAC supported the continuation of the RDRS after the end of its two-year pilot period, its improvement to address the needs of requestor communities, and efforts to encourage participation by all registrars since the system is currently voluntary. To that end, the GAC welcomes the Board's decision to adopt a resolution enabling the continued operation of the RDRS. The GAC also understands the Board intends to issue a policy alignment analysis for public consultation, outlining next steps needed to achieve the Board's vision for the RDRS. The GAC intends to				

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	closely review this analysis document and will consider making a submission to the Public Comment proceeding regarding the analysis, noting that the analysis document will address the future of the RDRS more holistically than the RDRS Standing Committee report. The GAC urges the ICANN Board to prioritize further actions on this issue after the Public Comment period on the policy alignment analysis.				

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Accuracy of Registration Data	The GAC continues to emphasize the importance of accuracy in domain name registration data for the security and stability of the DNS. The current state of work at ICANN, as well as relevant practices to ensure accuracy, were described by representatives from the community in a presentation to the GAC at ICANN84. The GAC notes the outcomes of the work of the GNSO Small Team on Accuracy and urges the GNSO to identify an implementation path for their recommendations. In particular, in relation to the Small Team's first recommendation, the GAC	GNSO Council	Yes	The GNSO Council Accuracy Small Team recommended to Council "examining the existing process for validating and verifying registration data under the 2024 Registrar Accreditation agreement ² and the potential impact on registrants if this process is modified." This was identified as an issue by the DNS Abuse Small Team as	The Accuracy Small Team also recommended creating clear and user-friendly educational materials that could be provided before, during, and after domain name registration to assist registrants in understanding, among others, the importance of providing and maintaining accurate registration data through the lifecycle of their domain name(s). It is the Council's understanding that at the request of the RrSG, ICANN org has completed a one-page document to highlight the importance of maintaining accurate registration data for registrants that registrars, registrants, and the community can reference.

² The terms validation and verification within this recommendation refer to the current definitions and associated requirements within the RDDS Accuracy Program Specification of the Registrar Accreditation Agreement (RAA). Specifically, validation requirements are defined in Section 1(a) - 1(d) of the RDDS Accuracy Program Specification, and the verification requirements are defined in Section 1(f) of the RDDS Accuracy Program Specification. "2013 Registrar Accreditation Agreement," ICANN org, 21 January 2024, <https://itp.cdn.icann.org/en/files/accredited-registrars/registrar-accreditation-agreement-21jan24-en.htm#rdds-accuracy>.

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	notes that the Registrar Accreditation Agreement (RAA) currently provides a 15-day timeline for registrars to validate and verify the contact information of registrants. Since malicious actors often utilize new domain names within hours of registering them, the GAC recommends that registrars be required to complete these validation and verification steps before a newly registered domain name can become accessible through the DNS, or before a domain name transfer can be completed. For example, this change could be achieved through policy development or through an amendment to the Registrar Accreditation Agreement (RAA) and/or the RDDS Accuracy Program Specification. Verification of contact			well. While the Preliminary Issue Report on a PDP on DNS Abuse Mitigation suggests that the first PDP on DNS Abuse should concentrate on the three priority gaps, there is support across community groups to explore future work on other gaps identified in Recommendation 4 of the DNS Abuse Small Team.. These topics (including the examining the existing process for validating and verifying registration data) could be considered in later policy development phases, subject to	

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	information could be performed, for example, through automated email or phone-based mechanisms at the point of registration or transfer. In addition, the GAC appreciated the clarification expressed by the GNSO Small Team Chair that the recommendation to terminate the Accuracy Scoping Team, paused since 2022, would not imply the end of community work on this matter. The GAC is of the opinion that the ICANN community should have an ongoing active forum in which to continue discussing possible next steps related to accuracy, whether it is the Scoping Team or another entity. These discussions should be open to community members outside the GNSO, including interested GAC members. The GAC notes the evolution			available resources, community bandwidth, and Council priorities.	

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	of technologies and registration practices that may affect the accuracy and reliability of domain registration data. The GAC encourages ICANN to undertake holistic assessments of such emerging trends and to promote exchanges of best practices among registries and registrars toward developing globally consistent yet locally adaptable accuracy frameworks.				

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DNS Abuse	During ICANN84, the GAC confirmed a two-pronged approach to its work on DNS Abuse, focusing on: 1) advancing policy progress, and 2) developing the capacity of GAC members on the subject. Regarding policy, the GAC notes that the 2024 DNS Abuse contract amendments served as an important first step, but more must be done to address the problem. Phishing, botnets, malware, and other forms of DNS abuse impose a tremendous cost upon the public, and adding new strings to the internet will increase the surface area for bad actors to perform these attacks. To prepare for this, the ICANN community must work together to ensure that sound and effective policies are put in place before the delegation of new strings. On this note, recalling its	GNSO Council	Yes	The GNSO Council requested an Issue Report on DNS Abuse in August 2025. The Preliminary Issue Report was published for Public Comment in September proposing two issues for policy development - Associated-Domain Checks and Unrestricted API access, and noted a third priority issue (Coordination on Domain Generation Algorithm (DGA)-based abuse) may be addressed more expeditiously outside of the ICANN Policy Development Process.	The Public Comment Summary Report was published on 17 November. The GNSO Council discussed the Preliminary Issue Report and its anticipated updates during its November meeting. The Council will review the Final Issue Report and discuss the next steps on policy development work on DNS Abuse during its December meeting.

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	ICANN83 Advice to the ICANN Board , the GAC recognizes the extensive efforts made by the ICANN community, prior to ICANN84, to proactively initiate DNS Abuse policy work. Swift progress should continue. In its submission to the ICANN Public Comment proceeding on the Preliminary Issue Report, the GAC notes that “the Issue Report prioritizes the issues specified for policy development” while appreciating that it “also identifies and explains a variety of additional “policy gaps” underlying DNS Abuse within ICANN’s remit” many of which are of high importance for the GAC. During ICANN84 the GAC discussed participation in upcoming policy development work, including the need for the charter to recognize GAC alternates to enable the GAC to			During ICANN84, the GNSO had a dedicated community session on DNS Abuse discussing the Preliminary Issue Report, Draft Charter and potential next steps.	

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	participate effectively. The GAC also noted with interest a point raised during discussion that there are different ways to automate the registration of a large number of domain names, and therefore policies should be effective while remaining technologically neutral. Additional policy issues outside of those targeted by the PDPs were discussed, including the absence of an obligation for the contracted parties to report on the abuse notices they receive and act upon. Without this data, the impact of the contract amendments on DNS Abuse, as well as the role of compliance in enforcing these new obligations, cannot be accurately measured. Further, the GAC supports ICANN providing DNS abuse contract				

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	compliance data in standardized, open, machine-readable formats, in order to support evidence-based policy development and enforcement. The GAC continues to prioritize the commencement of policy development. At the same time, the GAC will follow efforts to address the additional gaps raised by the Preliminary Issue Report, all of which should ensure that critical DNS abuse vectors are effectively mitigated.				