

17 April 2026

GNSO Council Review of ICANN85 Mumbai 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 Mumbai GAC Communiqué Issues of Importance following adoption by the Council at its 16 April 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 [ICANN85 GAC COMMUNIQUE](#)¹

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Urgent Requests for Disclosure of Registration Data	The GAC is pleased that the Board agrees to a 24-hour timeline for Contracted Parties to respond to authenticated Urgent Requests and looks forward to the amendment of the Registration Data Policy to integrate this timeline developed by the Implementation Review Team (IRT). The Board's decision is in line with GAC Advice from ICANN79 and Follow-Up on Previous Advice from ICANN80. The GAC appreciates the cooperation with the GNSO Council and the work by the ICANN community on this crucial issue. The GAC however notes that the 24-hour timeline for Contracted Parties to respond to authenticated Urgent Requests will remain contingent upon establishment of a law enforcement authentication mechanism. The GAC appreciates the ongoing collaboration of ICANN org with the	Reg Data IRT, GNSO Council	Yes	The GNSO Council had various sessions during ICANN85, where they discussed the topic of Urgent Requests. This topic is also an agenda item for the 16 April GNSO meeting, where next steps might be identified.	The GNSO Council acknowledges the GAC's emphasis on timely and effective implementation of Urgent Requests and agrees on the importance of law enforcement authentication as a critical enabler of the 24-hour response timeline. The Council notes that this work intersects with existing policy and implementation efforts and should remain aligned with the multistakeholder framework. There appears to be broad community alignment on the

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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	Public Safety Working Group (PSWG) to finalize law enforcement authentication mechanisms. The GAC recognizes the community's participation in the dedicated Practitioners Group. The GAC urges the ICANN Board and GNSO to quickly determine the most effective way to proceed with implementing authentication mechanisms for Urgent Requests. The GAC reiterates its position that a new Policy Development Process (PDP) is unnecessary, since the implementation and use of an authentication mechanism is part of the overall implementation process associated with the Registration Data Policy. Given the vital public safety interests involved in Urgent Requests, a new PDP would unduly delay further progress on this issue.				24-hour timeline, and the Council supports moving forward with its finalization. While authentication is necessary, its development should not delay operationalizing the timeline. The Council emphasizes maintaining a clear distinction between policy and implementation to avoid reopening adopted recommendations, and supports leveraging existing workstreams for addressing authentication considerations. The Council is scheduled to discuss next steps during its April Meeting. The Council also encourages continued information sharing

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					from the GAC Public Safety Working Group (PSWG) and supports a phased approach, enabling immediate progress on the timeline while advancing authentication mechanisms in parallel.
Registration Data Request Service (RDRS) and Policy Recommendations for a System for Standardized Access/Disclosure (SSAD)	The GAC appreciates the Board's decision to enable the development of Supplemental Recommendations informed by the experience of the Registration Data Request Service (RDRS), the findings of the RDRS Standing Committee Final Report, and the RDRS Policy Alignment Analysis. The GAC notes that this approach appears to provide the most appropriate path to advance work on a permanent and improved system without initiating a new Policy Development	RDRS SC, GNSO Council, ICANN GNSO Council, Board	Yes	The GNSO Council covered this topic during its ICANN85 working session. In addition, a dedicated session discussing potential membership, group models took place during ICANN85 too. The Council is	The GNSO Council appreciates the input that the GAC has provided on this matter, both in the Communiqué and during its meeting with the Council at ICANN85. The Council is finalizing the details for developing Supplemental Recommendations, including team composition, and expects GAC representatives will be

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	Process. The GAC reiterates its view that ICANN should move toward a permanent, centralized and globally accessible mechanism to channel registration data requests, and that participation by gTLD registrars should be mandatory to ensure the usefulness, effectiveness and completeness of such a mechanism for requestors. The GAC also encourages timely consideration of appropriate participation models for affiliated privacy and proxy services and continues to support efforts to explore voluntary participation by ccTLDs. The GAC encourages the ICANN Board and GNSO Council to proceed expeditiously with the Supplemental Recommendations process and to develop clear timelines for next steps. The GAC also welcomes the proposed engagement of the broader community in the Supplemental Recommendations process through the “Small Team Plus” format involving Advisory Committees, and looks forward to participating in			currently reviewing the proposal of a Supplemental Recommendations team, which will be further discussed during its 16 April meeting.	able to participate in the process. The Council shares the GAC’s goal of ensuring that this work is completed in a timely manner.

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	this work to ensure that public safety considerations are substantively reflected in the revised recommendations. The GAC further appreciates the assurance provided by the GNSO Council that it aims to complete the Supplemental Recommendations process in a matter of months as opposed to stretching the timeline potentially over a year.				
Privacy and Proxy Services	The GAC appreciates the work of the Privacy and Proxy Services Accreditation Issues (PPSAI) Implementation Review Team (IRT) toward implementation of the PPSAI recommendations. The GAC welcomes the IRT's timeline to advance this work during the 2026 calendar year. The GAC intends to follow these efforts and provide input on the process. In addition, the GAC reiterates that the RDRS must address complexities that arise from affiliated Privacy and Proxy services to be fit for purpose.	GNSO Council, PPSAI IRT	Yes		The GNSO Council acknowledges the GAC's input about the need for the RDRS to address complexities that arise from affiliated Privacy and Proxy services. The RDRS Policy Alignment Analysis prepared by ICANN Org in October 2025 noted that the "GNSO Council may include proxy and privacy use cases if they choose to revisit the EPDP Phase 2 recommendations together to

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					ensure there is a coordinated effort to streamline the processes, criteria, and tools used to request access to nonpublic data...” Similarly, in her 18 March letter regarding the Board’s vote not to adopt the SSAD policy recommendations, Tripti Sinha conveyed the Board’s expectations that the Council incorporate “confirmation of how the mechanism can be used to make and respond to requests for gTLD nonpublic registration data for underlying affiliated privacy/proxy domains” into the Supplemental Recommendations. The GNSO Council has not yet developed the work plan or

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					scope for developing Supplemental Recommendations for the SSAD policy recommendations but will take all of this input into consideration as it does so. Finally, the GNSO Council would like to clarify that the Supplemental Recommendations will identify what the future system for requesting access to nonpublic registration data will be.

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DNS Abuse - Part 1 - PDP1 Workplan	The ICANN85 DNS Abuse session covered national ccTLD policies, the multistakeholder gTLD policy development process currently underway at ICANN, and a voluntary, multistakeholder initiative to mitigate DNS abuse outside of ICANN. The GAC welcomed a presentation by the host country ccTLD (.in) on its policies to prevent DNS Abuse, as well as the Trusted Notifier Network (TNN), a not-for-profit organization focused on facilitating and operationalizing trusted notifier programs. 8 GAC Members participated in the inaugural meetings of the GNSO Policy Development Process on Associated Domain Checks, and find that the PDP is off to a good start. The GAC favors shortening the overall timeline of the work and encourages the GNSO Council and ICANN org to regularly assess whether project milestones are being achieved. The GAC expects that the narrow scope of the PDP will yield rapid results, so that it can be treated as a	GNSO Council, PDP1 WG	Yes	The DNSAM PDP1 Working Group is currently working on its PDP timeline and will submit it to Council for the 16 April meeting. GNSO Council passed a motion in December 2025 noting the following: “The GNSO Council will revisit the draft Charter and timing for the commencement of DNS Abuse Mitigation PDP 2 when deemed appropriate based upon the progress and resources needed for PDP 1. The Council asks staff to find efficiencies where	The GNSO Council thanks the GAC for providing members and participants to the DNSAM PDP1 Working Group, and for its submission of early input to the process for consideration. The Council notes that in its bilateral with the Board, the DNSAM PDP 1 draft timeline and workplan was a topic for discussion and there was a shared understanding that the policy development will proceed effectively and efficiently with every effort made to provide appropriate resources for its success. Council further notes that the DNSAM PDP1 WG has received feedback from the wider community, Board and SOACs.

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	“blueprint” for effective policy development at ICANN going forward.			sensible and appropriate in managing the two separate PDPs.”	The Working Group plans to submit a revised workplan for Council consideration and adoption in its April meeting. The Council will continue to monitor the PDP progress via its liaison and other regular updates.

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DNS Abuse- Part 2 - PDP2 and other issues	Concerning future work on DNS Abuse, beyond PDP2 (Safeguards for Application Programming Interface – API – access to new customers) and a coordination mechanism for combating Domain Generation Algorithm (DGA) Botnet attacks, the GAC recalls the importance of also addressing the other critical gaps identified in the Issue Report. Transparency of reporting, underuse of predictive algorithms for early detection, subdomain abuse, and reducing the time for registrant contact verification remain particularly important issues for the GAC. The Committee welcomes the indication from the GNSO Council that it is developing a methodology to prioritize these policy gaps, and would appreciate further details as soon as possible.	GNSO Council	Yes		Regarding work on PDP2 (Safeguards for Application Programming Interface – API – access to new customers), the Council notes that there has been preliminary discussion to revisit the charter at an appropriate time after the workplan for PDP1 is received. The Council also notes that there are ICANN community efforts and contributions undertaken during ICANN85 by the CPH on a community update on what Domain Generation Algorithm (DGA) Botnet attacks are including existing mitigation approaches. The Council is developing a method to prioritize its work and will use it to address critical gaps identified in the Final Issue

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					Report to develop effective policies on items within the scope of a PDP.

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DNS Abuse- Part 3 - Voluntary action and other issues	The GAC expresses its strong interest in engaging further with the Board and the Contracted Parties on how to address – in a swift and effective manner – the current 15-day timeline for registrars to validate and verify registrants contact information. As the INFERMAL study notes, when the validation of registrant information takes place during the account creation or before the domain purchase, it is associated with a 70% decrease in malicious registrations. To mitigate DNS Abuse, verification of registrant contact information should take place before a newly registered domain name can become accessible through the DNS. A possible path to be further explored in this regard is contract amendments, and the GAC will continue to consider the best path for efficient implementation. The GAC also encourages ICANN to explore the establishment of a centralized reporting mechanism managed by ICANN for the periodic reporting of DNS Abuse	GNSO Council, ICANN Community	Yes		The Council recognizes and appreciates that there are efforts and voluntary initiatives outside its policy development remit that collectively contribute to DNS Abuse mitigation and encourages continued constructive collaboration with an eye to progress.

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	complaints received by registrars and registries, including the number of complaints and actions taken. Such reporting would help provide a clearer understanding of abuse trends, improve transparency, and support more effective policy responses. Finally, the GAC recognizes the importance of voluntary collaborative initiatives on DNS Abuse mitigation practices beyond ICANN’s remit, given their flexibility in addressing real-world issues, and encourages the community on a voluntary basis to continue exploring paths for such collaboration, including in the context of trusted notifier schemes. The GAC reiterates its commitment to cooperate with the ICANN community, through policy development and capacity building, to make progress on addressing DNS Abuse.				

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UDRP Review	The GAC welcomed a presentation from the World Intellectual Property Organization (WIPO) and the Internet Commerce Association (ICA) on their independent joint report on the UDRP review. The GAC understands that work by the GNSO on this review is on the horizon. The GAC suggests that the GNSO consider using the WIPO-ICA report as a resource to frame the upcoming UDRP review and identify pending issues for further discussion.	GNSO Council	Yes	In May 2025, the Council passed a motion resolving the following: 1. The GNSO Council adopts the motion to defer next steps on Phase Two of the RPMs PDP – specifically the launch of a Charter Drafting Team – for an additional 6-month period beginning on 15 May 2025. 2. The GNSO Council may	The GNSO Council acknowledges the GAC’s suggestion to consider the WIPO–ICA Final Report as an input to the upcoming UDRP review and agrees that it represents a valuable resource reflecting extensive practitioner experience. The Council notes that the UDRP review (RPM Phase 2) remains subject to ongoing Council prioritization and resource planning, and that initiation of this work will require revisiting and refining the existing charter to ensure a more focused, efficient, and outcome-oriented process. In this context, the Council agrees on the importance of narrowly

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				revise the deferral period depending on the progress of the RPM Phase 1 IRT and/or the outcome of Council's prioritization exercise via an adopted motion.	scoped and well-defined charter questions, informed by relevant expert inputs, including the WIPO–ICA report and broader community contributions.