

GAC ICANN85 MUMBAI Communiqué: Issues of Importance (16 March 2026) - ICANN Board Comments for Board-GAC Interaction Group (BGIG) Call

Version 1.2

Updated (20 April 2026)

Issues of Importance

The table below contains the Board’s Comments related to the [GAC ICANN85 MUMBAI Communiqué](#), in support of the BGIG Meeting @ 23 April 2026. **This scorecard will not be presented to the Board for resolution.**

Issue Title (from Communiqué)	Issue Text (from Communiqué)	ICANN Board Comments
1.a. Domain Name Registration Data: 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 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.	• The Board appreciates the GAC’s support for the 24-hour timeline for Contracted Parties to respond to authenticated Urgent Requests and the ongoing collaboration between ICANN org and the Public Safety Working Group (PSWG) to develop law enforcement authentication mechanisms. • The Board notes that the GNSO Council, subsequent to discussions at ICANN85, is considering (1) a confirmation that implementation of the response timeline language incorporating the authentication mechanism is consistent with Expedited Policy Development Process (EPDP) Phase 1 Recommendation 18, and (2) a set of options for implementing authentication mechanisms for Urgent Requests. • ICANN org is preparing to update the Registration Data Policy with the 24-hour Urgent Request timeline language, pending communication from the GNSO Council confirming the outcomes of its discussion. • The Board looks forward to continued progress on authentication mechanisms for Urgent Requests and the continued collaboration between ICANN org and the PSWG on the development of the authentication mechanism. • The Board is interested in the GAC’s feedback on the best way to advance the logistical work on authentication, for example, would the GAC be supportive of a testing group or other transparent, multistakeholder effort to support preparation of contracted parties and requestors to implement the mechanism? We understand ICANN org believes this could be done in parallel with any GNSO discussions and is prepared to take the lead on this work.
1.b. Domain Name Registration Data: 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 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 this work to ensure that public safety	• The Board appreciates the GAC’s support for the resolution not to adopt all 18 SSAD policy recommendations as a package in order to trigger development of Supplemental Recommendations as recommended by the GNSO Standing Committee, agreed in discussion with the GNSO Council, and defined in Annex A, Section 9(d) of the ICANN Bylaws. • The Board believes this action is in the best interests of ICANN and the community and will serve the global public interest by allowing the GNSO to make the necessary modifications to the recommendations and align the various policies affecting requests for generic top-level domain (gTLD) nonpublic registration data as outlined in the RDRS Policy Alignment Analysis. • The Board looks forward to Supplemental Recommendations that include the following four elements identified by the community – including the RDRS Standing Committee, the GAC, and comments received on both the RDRS Standing Committee report and the RDRS Policy Alignment Analysis – as important for RDRS or a successor system for requesting access to gTLD nonpublic registration data: ○ Mandatory registrar participation in mechanisms for requesting gTLD nonpublic registration data, which align with the presumption that consensus policies are binding on all contracted parties. ○ Confirmation of how the mechanism can be used to make and respond to requests for gTLD the underlying nonpublic registration data for privacy/proxy domains. ○ Inclusion of service level agreements that require registrars to provide substantive responses to disclosure requests on an agreed timeline for urgent requests that are authenticated, as originally envisioned in the SSAD recommendations.

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	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.	○ An authentication mechanism for law enforcement authorities and a phased approach for federated authentication for other user groups to facilitate urgent request responses, as originally envisioned in the SSAD recommendations. ● The Board notes that ICANN will continue to explore options for voluntary ccTLD participation in RDRS or any successor system, as the GNSO and community continue work on SSAD Supplemental Recommendations. ● ICANN org will also continue working with law enforcement agencies, including the FBI and Interpol, on authentication proof-of-concept testing to develop requirements for authentication identity providers. ● The Board welcomes the GAC’s and broader community’s input on Supplemental Recommendations and supports completing the work in a timely manner. ● The Board also appreciates the GNSO Council’s agreement that Supplemental Recommendations “should be delivered to the ICANN Board within months, not years.” ● The Board notes that the GNSO Council will continue discussing the next steps for Supplemental Recommendations, including the composition of the group who will develop the Supplemental Recommendations and the proposed timeline for completing this work, during its meeting on 16 April.
1.c. Domain Name Registration Data: 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.	● The Board appreciates the GAC’s support for the Privacy and Proxy Services Accreditation Issues (PPSAI) Implementation Review Team (IRT) work toward implementation of the PPSAI policy recommendations. ● The Board appreciates the GAC’s intention to follow PPSAI work and welcomes the GAC’s input in the process. ● The Board acknowledges the GAC’s note that RDRS must address the complexities that may arise from affiliated Privacy and Proxy services. As noted above, the Board looks forward to confirmation of how the RDRS or its successor mechanism can be used to make and respond to requests for gTLD nonpublic registration data for underlying affiliated privacy/proxy domains, as one of the elements identified by the community. ● The ICANN org PPSAI implementation team is coordinating with the RDRS team to ensure strong coordination between the current policy implementation and planned discussions on the future of RDRS or successor mechanism.
2. DNS Abuse Mitigation	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. 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 “blueprint” for effective policy development at ICANN going forward. 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	● The Board acknowledges the positive update on the PDP Working Group (WG) on Associated Domain Checks and welcomes the broad community participation, including sustained engagement on DNS Abuse Mitigation. ● The Board notes the concerns expressed regarding the initial 18-month timeline proposed for the PDP on Associated Domain Checks. The Board understands that this proposed timeline is indicative and subject to further refinement by the WG. However, it is important to note that the GNSO PDP process includes procedural requirements (and timelines stipulated by the Bylaws e.g. public comment) that necessitate sufficient time to ensure due process and inclusivity, and indeed the PDP WG has already indicated that it will continue to review and potentially adjust its timeline as appropriate. ● Concerning future work on DNS Abuse, the Board acknowledges the GAC’s views on the importance of addressing additional gaps identified in the Issue Report. At the same time, the Board emphasizes that careful evaluation and prioritization of these topics is necessary to ensure that any future work is appropriately scoped and supported by the community. In addition, it is important to ensure that adequate community and staff resources are available to support additional work, considering the Council’s broad portfolio of responsibilities. The Council has been discussing a methodology for

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	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. 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 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.	prioritizing its work and DNS Abuse mitigation will be taken into consideration once that methodology is agreed upon. • The Board welcomes the GAC’s interest in continued engagement on requirements governing registrant information and associated operational timelines. This issue was discussed in the Issue Report and was noted as a priority topic to be considered for follow-up PDPs once work on the current priority topics has concluded. The Board also takes note of the GAC’s suggestions regarding enhanced transparency, including the potential exploration of a centralized reporting mechanism for DNS Abuse complaints. The Board recognizes that such proposals could enhance understanding of DNS Abuse trends and inform future work. The Board notes that further due diligence, including a review of work being done by third-parties such as FIRST and MA3WWG, as well as multistakeholder discussion would be beneficial before advancing specific solutions. • As with the GAC, the Board recognizes the importance of voluntary, collaborative initiatives on DNS Abuse mitigation—particularly on matters beyond ICANN’s remit—and agrees that such efforts can offer flexibility in addressing real-world challenges. Policy development may not be the only or most appropriate mechanism to address all aspects of DNS Abuse. • The Board welcomes the GAC’s continued commitment to cooperate with the ICANN community through policy development and capacity building to make progress in combating and mitigating DNS Abuse.
3.a. Next Round of New gTLDs: Applicant Support Program	The GAC welcomes the ICANN Board’s update regarding the Applicant Support Program (ASP) and is encouraged by the receipt of 75 applications spanning all five ICANN regions. The GAC expresses its strong support for the Board’s proposal to allocate the necessary additional funds from the proceeds from the 2012 round of new gTLDs. Expanding the funding envelope to accommodate up to 75 qualified applicants—well beyond the originally budgeted 45—directly aligns with the GAC’s long-standing advocacy for maximizing diverse participation in the Next Round of New gTLDs. However, the GAC emphasizes that increasing the <i>number</i> of supported applicants must not compromise the <i>depth</i> of financial assistance originally proposed. The GAC recommends that this budget expansion should fully preserve the ability to apply the maximum base fee reduction of 85% to all qualified ASP applicants.	• The Board appreciates the GAC’s strong support for the Board’s proposal to allocate the necessary additional funds to allow funding of qualified ASP applicants beyond the originally budgeted 45. • The Board notes the GAC’s recommendation to “fully preserve the ability to apply the maximum base fee reduction of 85% to all qualified ASP applicants”. As noted in the 6 April 2026 blog, the Board is supportive of the idea to increase the discount to 85 percent for up to 75 qualified applicants, which was the maximum funding amount originally budgeted for up to 40 applicants in the Applicant Support Program Handbook. However, an 85 percent discount for up to 75 applicants exceeds the level of funding on which the Board previously sought input. Therefore, the 6 April blog requests community input on the additional budget needed to provide an 85 percent discount if all 75 applicants qualify. If feedback is positive, the Board will consider the increase to fund the additional amount from the 2012 Round auction proceeds through a separate resolution. • The Board understands that, consistent with the SubPro Final Report and GGP guidance, ICANN staff is conducting monitoring and evaluation activities including surveys to participants in ICANN engagement activities and a survey to all ASP applicants. Updates on this work were presented to the GAC during

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	The GAC also encourages continued transparency regarding the evaluation, implementation, and outcomes of the ASP.	ICANN82. For up to date information on ASP evaluations please see https://newgtldprogram.icann.org/en/application-rounds/round2/asp/stats for the latest information.
3.b. Next Round of New gTLDs: Community Applications	The GAC notes that ICANN org will decide which vendor will conduct Community Priority Evaluation (CPE) for the Next Round of New gTLDs. The GAC welcomes the announcement by ICANN org that the CPE evaluation guidelines will be opened for public comment. The GAC will follow the process closely as the successful implementation of CPE will be impactful for the involvement of communities in the Domain Name System.	• The Board appreciates the GAC’s comments and understands the topic of Community Applications and Community Priority Evaluation (CPE) is of importance to the GAC and larger ICANN community. • The Board notes that ICANN org announced on 18 March 2026 that it selected Analysys Mason as the CPE vendor. Additionally, ICANN org opened the Public Comment on the Evaluation Guide on 24 March 2026. • The Board understands that ICANN org has worked together closely with the SubPro Implementation Review Team (IRT) to duly consider the SubPro recommendations regarding Community Applications, which are based on lessons learned from the 2012 round, and to ensure that the 2026 Round Applicant Guidebook provides clear guidance for applicants as well as the CPE panel. The Evaluation Guide is intended to complement the information contained in the AGB.
3.c. Next Round of New gTLDs: TLD Application Management System	The GAC thanks ICANN org for the timely release and previews of the TLD Application Management System (TAMS), which represents an important step toward facilitating the submission and management of applications in the upcoming round. To support GAC members and Observers in carrying out their responsibilities during the application review period, the GAC encourages ICANN to provide dedicated intersessional sessions prior to ICANN86 explaining how GAC Members and Observers will be able to access the publicly available information that will allow for review of the applications. The GAC asks for these tools to allow for search and download options that would increase the efficiency of the application reviews by GAC members.	• The Board appreciates the GAC’s feedback and notes that these previews, as well as other information shared during the ICANN85 sessions can be found here: https://newgtldprogram.icann.org/en/resources/webinarspresentations/2026. • The Board understands that the 2026 Round Team has been and will continue working closely with the GAC support team on further dedicated sessions that may assist the GAC in its preparations for the review of applications. As shared by the team during ICANN85, on Reveal Day, all public sections of confirmed new gTLD applications will be posted on the 2026 Round website, in a similar format as in 2012 which allows for search and sorting. In addition, the team will make available to GAC members an output of certain information to further facilitate GAC members’ review of application information.
4. 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.	• As noted in the response on DNS Abuse Mitigation, the Council has been discussing a methodology for prioritizing its future work. While the GNSO Council appears to be at or near capacity currently, with commitments to DNS Abuse Mitigation, Latin Diacritics, and SSAD Supplemental Recommendations, it is important for the Council to be able to agree on which efforts should be pursued when adequate capacity is available. • The Board anticipates that the Council will duly consider the WIPO-ICA report, and potentially identify other relevant inputs, to inform its deliberations as to prioritizing and scoping future policy development on the UDRP.
5. Governance of the Regional Internet Registries	The GAC welcomed the update from the Address Supporting Organization (ASO) regarding the drafting of the Governance Document for the Recognition, Operation, and Derecognition of Regional Internet Registries (RIRs) (“RIR Governance Document”). The GAC noted that the RIR Governance Document remains under development and that the final version is still being drafted. In this regard, the GAC encourages that the issues raised during GAC deliberations be duly taken into account in the preparation of the final document and communicated to the RIR Governance drafting process. These include, among others, the importance for the RIRs to operate their policies in the public interest, including the continued stewardship of Internet number resources in an efficient and transparent manner, and	• Like the GAC, the Board closely follows the ongoing effort to update Internet Coordination Policy 2. As this work approaches a conclusion, the Board looks forward to reviewing the Regional Internet Registry (RIR) Governance Document. Per its Bylaws commitments, prior to Board action, the Board will notify the GAC if the proposed RIR Governance Document might impact any public policy concerns and will take into account any advice that might be timely presented.

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	monitoring and auditing of RIRs performance according to objective and measurable operational criteria. The GAC emphasizes that any processes related to the governance of the RIRs should comply with ICANN’s existing multistakeholder approach. The GAC is looking forward to reviewing the final outcome document as part of the process for approval and adoption of an updated ICANN policy on Governance of the Regional Internet Registries.	
6. Root Server System	The GAC welcomed the overview provided by the Root Server System Advisory Committee (RSSAC) about the structure of the DNS Root Server System and the stability and resilience of the service which the diverse group of Root Server Operators (RSOs) has delivered since the inception of the DNS. The GAC is keen to continue the conversation with RSSAC, the RSOs and the Root Server System Governance Working Group (RSSGWG) about the ongoing efforts both in technological development and governance to ensure the stability and resilience of the DNS Root System in an ever changing and expanding ecosystem. In particular, the GAC would like to learn more about current and future frameworks on incident detection, mitigation and reporting, and how those are used to provide learnings for future enhancements in risk modelling and mitigation within the various organizations involved in operating the Root Server System.	• The Board appreciates the GAC’s focus on the governance, operation, and resilience of the Root Server System (RSS). The Board notes that the RSSAC proposed a process for the dissemination of security incident information in RSSAC062, which the Board understands is issued as initial guidance to the future RSS Governance Structure contemplated through the RSS GWG Final Report. Though there is currently no estimated timeframe for when the RSS Governance Structure will be functional, the Board will soon begin its consideration of the RSS GWG Final Report. The Board encourages the GAC and RSSAC to continue their discussions about the RSS.
7. Review of Reviews	The GAC is still discussing the draft design proposal giving consideration to the GAC’s unique status in the ICANN Bylaws and existing Operating Principles. The GAC welcomes the Cross Community Group (CCG) outreach and inclusiveness efforts, allowing active participation by observers and reaching out to members and chairs of past Review Teams, and welcomes the approach followed so far, maintaining successes of past reviews, building on work of ATRT3 and being forward looking for sustainability. The GAC will continue to participate in the CCG, with special interest in: • How important reviews – such as the Security, Stability, and Resiliency (SSR) Review and the Competition, Consumer Trust, and Consumer Choice (CCT) Review that are closely linked to the ICANN’s mission established in the Bylaws – will be accommodated in the refreshed proposal; • How the overall cadence and workload will look like after compiling all reviews on one timeline; • How the final proposal will be driven by a functional approach, taking care that each review has a distinct function and a clear added-value, be mindful of resources, and be communicated in clear, plain language, enabling those unfamiliar with ICANN to understand how the review system works.	• The Board appreciates the GAC’s participation in the community dialogue to identify a system of reviews that is fit for purpose, and its support for the approach being taken by the Cross Community Group. The Board is also participating and following this work closely, including discussions among the Board on the areas of interest identified by the GAC. • The Board agrees that it is essential to clearly state the purpose of individual review components, including how they would interrelate. A comprehensive overview of the proposed cadence of review activities and a clear definition of resources required to execute review efforts are critical to building a system that is sustainable and ultimately strengthens the accountability practices in support of ICANN’s Mission.