
WHOIS and Registration Data Issues

Session 14

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Session Objective

This session aims to discuss status and consider possible next steps for the GAC in relation to deliberations and implementation efforts seeking to establish a new WHOIS/Registration Data policy framework taking into account relevant Data Protection law.

The GAC will be briefed on latest developments and related policy concerns, in connection with:

- Ongoing discussions regarding the handling of specific Urgent Request for disclosure of registration data;
- Operations and future of the Registration Data Request Service (RDRS) and associated 2021 GNSO policy recommendations for a System for Standardized Access/Disclosure (SSAD);
- And considerations for advancing future policy work regarding accuracy of registration data.

Leadership Proposal for GAC Action

1. **Assess progress and prospects towards establishing an appropriate timeline for handling of Urgent Requests for disclosure of registration data** in *circumstances that pose an imminent threat to life, serious bodily injury, critical infrastructure, or child exploitation*. Following GAC Advice in the [San Juan Communiqué](#) (11 March 2024) and Follow-up in the [Kigali Communiqué](#)¹ (17 June 2024), the GAC [proposal to the ICANN Board](#) (15 October 2024) and encouragement for relevant groups to be convened in the [Seattle Communiqué](#) (17 March 2025), work is currently proceeding in two tracks conducted in parallel to:
 - a. **Explore possible mechanisms to authenticate emergency law enforcement requestors** in a cross community Practitioner's Group convened by the PSWG Co-Chairs
 - b. **Determine an appropriate response time for authenticated Urgent Requests** in a reconvened Registration Data Policy Implementation Review Team
2. **Consider expected discussions of the future of the Registration Data Request Service (RDRS) and associated policy recommendations for a System for Standardized Access/Disclosure (SSAD)** by the GNSO Standing Committee and GNSO Council in light of:
 - a. [GAC Comments](#) (29 Sept. 2025) on the [RDRS Standing Committee Report](#) (19 August 2025) including the GAC recognition “*that the original package of EPDP Phase 2 recommendations may benefit from revision in light of RDRS findings [...]*” but concerns “*that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations [...]*”
 - b. The ICANN Board’s support for RDRS to remain in operation beyond the duration of its 2-year pilot program, and for improving it, by leveraging EPDP Phase 2 SSAD policy recommendations where possible, and potentially new policy development if necessary, to address the main challenges and opportunities identified by the GAC to date, and to apply lessons learned from the pilot program, to ensure:
 - i. **Increased awareness of the service by its intended users** by directly linking to it from legacy WHOIS data systems (that is by referencing RDRS in the RDS/WHOIS output of Registries and Registrars with which many Internet stakeholders are familiar, contrary to the new ICANN Lookup tool consistent

¹ San Juan Communiqué Advice: “*The GAC advises the ICANN Board: i. To act expeditiously to establish a clear process and a timeline for the delivery of a policy on Urgent Requests for domain name registration data, to respond to the vital public safety interests related to such requests. Such a process must ensure appropriate participation of the community, including the GAC.*”

GAC Kigali Communiqué Follow-Up: “[...] *The GAC urges the GNSO Council and the Board to take any necessary steps in an expeditious manner to “establish a clear process and a timeline for the delivery of a policy on Urgent Requests for domain name registration data”, given the vital public safety interests related to such requests, as per the ICANN79 San Juan GAC Advice. [...]*”

with previous GAC suggestions in the [ICANN79 San Juan Communiqué](#) and in the [ICANN80 Kigali Communiqué](#)²

- ii. **Mandatory participation of registrars** considering that less than 50% of gTLDs domains are currently covered by the RDRS³
- iii. **Integration of affiliated proxy services** (Registrar operated), to facilitate access to underlying contact information of the beneficial user of a domain name
- iv. **Voluntary participation of ccTLD Operators** to address the demand for ccTLD domain name registration data in RDRS, as evidenced in analysis of unsuccessful requests previously presented to the GAC.

3. **Examine possible paths for progress on accuracy of registration data** in gTLDs, in light of [recommendations](#) (31 July 2025) of the [GNSO Small Team on Registration Data Accuracy](#), adopted by the GNSO Council (14 August 2025) following previous [GAC Input](#) (14 February 2025) on a set of “threshold questions” identified by the GNSO Council.
- A [pre-ICANN84 GAC Webinar](#) (15 October 2025) on this matter featuring ICANN Compliance aimed to inform GAC Members and Observers on current Registration Data accuracy requirements and how they are audited and enforced. This webinar was also expected to prepare the GAC for a panel discussion planned to take place during the ICANN84 GAC Plenary Session on Registration Data and expected to discuss current accuracy practices by Contracted Parties.

² The GAC invited ICANN to consider including a link to the RDRS in WHOIS output, in its [Comments on the RDAP Contractual Amendments](#) (16 Nov. 2022) given that it is a channel “certain to reach 100% of the potential [RDRS] use-base”, and more recently in Issues of Importance in the [ICANN79 San Juan Communiqué](#) (11 March 2024) where the GAC strongly encouraged “to include information about the RDRS and a link to it within the WHOIS lookup/Registration Data Access Protocol (RDAP) with a view to increase its visibility” and in the ICANN80 Kigali Communiqué (17 June 2024) where the GAC expressed its belief that “providing a link to the RDRS via the ICANN registration data lookup tool could help in reaching potential RDRS users who may not be aware of the pilot”

³ Voluntary Participation in RDRS currently has diminished from 95 Registrars representing 60% of all gTLD domains under management in February 2025, down to 78 registrars managing 47% of all gTLD domains. See “List of Participating Registrars” at the end of the monthly RDRS Usage Metrics Reports available at: <https://www.icann.org/rdrs-en>

Current Status and Recent Developments

- **The Registration Data Request Service (RDRS)**, which launched on 28 November 2023 as a proof of concept or pilot program aimed to *“simplify the process for submitting and receiving requests for nonpublic gTLD registration data for both the requestors and contracted parties”* and to inform further consultations on the feasibility of a permanent System for Standardized Access/Disclosure of Registration Data (SSAD). The RDRS **has enabled the collection and reporting on close to 2 years of usage data**⁴. Since November 2024, ICANN org has started reporting on two new metrics which provide a **breakdown of disclosure requests by country or processing jurisdiction and by requestor type** (see for instance p.26 and p.31 of the [February 2025 RDRS Usage Metrics Report](#)).
 - In the [ICANN82 GAC Seattle Communiqué](#) (17 March 2025), the GAC noted ***“with interest the Board’s support for maintaining and enhancing the RDRS”*** and expressed support for this concept, suggesting *“that steps towards improving the pilot system should already be taken based on the results of the first year”*.
The GAC also expressed the view that there is *“substantial room for the RDRS to generate additional value, including for requestor communities, especially if the system can be adequately enhanced based on users’ feedback and usage metric reports.”*
The GAC recalled its recommendations that RDRS participation be made mandatory for all gTLD registrars; that the system should provide underlying data for privacy and proxy registrations; that the RDRS should incorporate APIs to better facilitate RDRS usage by requestors and registrars and to make it ready to incorporate future authentication solutions for law enforcement; and invited the ICANN Board and the ccNSO to explore ways to overcome the existing challenges to allow the voluntary participation of ccTLDs in the system.
 - In the [ICANN83 GAC Prague Communiqué](#) (16 June 2025), the GAC The GAC expressed its ***“concerns regarding the reduced use of the tool in light of the departure of certain registrars from the pilot and reiterates its recommendation that RDRS participation should be made mandatory for all gTLD registrars to increase its utility”***. The GAC renewed *“its call for the RDRS to continue operating beyond its pilot period and for enhancements to be made to the RDRS as previously identified by both the ICANN Board and the GAC”*. The GAC also welcomed *“the Board’s comment during ICANN83 that ICANN is developing an analysis of which envisioned enhancements to the RDRS would require new policy development and which ones could be completed based on existing recommendations or policies.”*
 - In response to the [Public Comment proceeding](#) on the [RDRS Standing Committee Report](#) (19 August 2025), the [GAC submitted Comments](#) (29 Sept. 2025) in support of most of the recommendations to the GNSO Council, including:

⁴ See monthly Registration Data Request Service Usage Metrics since the launch of the service, available at <https://www.icann.org/rdrs-en> and consider further material expected from ICANN org during an [ICANN84 Prep Week update session](#) to be held on Tuesday 14 October at 1930 UTC.

- Recommendation 1: Continue the RDRS beyond the pilot period.
 - Recommendation 2: Allow for authentication of interested requestor groups, beginning with law enforcement.
 - Recommendation 3: Implement Key System Enhancements to sustain and evolve RDRS post-pilot while more policy work is underway.
 - Recommendation 4: Consider further policy work in specific areas such as privacy/proxy data and the inclusion of RDRS links in RDAP responses
 - Recommendation 6: Maintain the current Standing Committee with narrowed Scope.
- Regarding Recommendation 5 of the [RDRS Standing Committee Report](#) (19 August 2025) regarding next steps on EPDP Phase 2/SSAD Policy Recommendations, the [GAC Comments](#) (29 Sept. 2025) recognized *“that the original package of EPDP Phase 2 recommendations may benefit from revision in light of RDRS findings [...]”* but expressed concerns *“that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations [...]”*
 - The GAC called “for measures to ensure the ultimate result is progress toward the Board’s previously expressed goals of:
 - Making RDRS participation mandatory for all gTLD registrars, which the Board has suggested could be done based on an existing EPDP Phase 2 policy recommendation;
 - Continuing RDRS operation past its pilot period “until missing policy elements are in place”;
 - Better facilitating requests through RDRS for the data underlying registrations made with a privacy or proxy service, especially when the service is affiliated with an ICANN-accredited gTLD registrar;
 - Developing a policy requirement for privacy and proxy service providers affiliated with registrars to participate in RDRS;
 - Developing a mechanism that allows for authentication or accreditation of requestors;
 - Creating APIs for both registrars and requestors to facilitate greater ease of use and integration of RDRS into existing processes for registrars;
 - Considering options to enable voluntary participation by ccTLD operators, given requestor interest in ccTLD participation but also challenges related to technical compatibility and diverse national policies affecting ccTLDs.

- **Feasibility of a permanent System for Standardized Access/Disclosure of Registration Data (SSAD)** has been focusing on assessing the operations of the Registration Data Request Service (RDRS), following the [GNSO's request for an SSAD proof of concept](#) (27 April 2022) on the basis of an ICANN org [Design Paper](#) (13 Sep. 2022) and consistent with [updates](#) (7 Nov. 2022) [suggested](#) by the GNSO Council to the ICANN Board (17 Nov. 2022). **The ICANN Board is now discussing the possibility of prolonging operations of the RDRS for the foreseeable future**, with potentially significant improvements, which the GAC has been seeking, while the [GNSO RDRS Standing Committee](#) is expected to make recommendations to the GNSO Council, based on RDRS lessons learned, regarding the future of the EPDP Phase 2 Final Recommendations, to be discussed with the ICANN Board.
 - The GNSO [resolution](#) on the EPDP Phase 2 Final Report (24 September 2020) **adopted the 18 recommendations that seek to establish an SSAD, requesting a consultation with the ICANN Board** prior to its consideration of the policy recommendations **to discuss “questions surrounding the financial sustainability of SSAD and some of the concerns expressed within the different minority statements”** including in the [GAC Minority Statement](#) (24 August 2020).
 - Prior to considering the GNSO's SSAD Policy Recommendations, **the ICANN Board launched** (25 March 2021) an **Operational Design Phase (ODP) to perform an assessment** of possible implementation parameters. A GNSO Small Team reviewed ICANN org's resulting [Operational Design Assessment](#) (25 Jan. 2022) in support of the GNSO Council's consultation with the ICANN Board and consideration of questions and concerns expressed in a [Board letter](#) (24 Jan. 2022).
 - In a [letter to the ICANN Board](#) (27 April 2022), **the GNSO shared concerns with ICANN's Operational Design Assessment** and called for a pause of the Board's consideration of the SSAD recommendations to allow for work to continue on a “proof of concept”, in collaboration with ICANN org, who suggested it could propose a simplified “SSAD Light Design” in a [Concept Paper](#) (6 April 2022)⁵. The **ICANN Board confirmed** (9 June 2022) its **agreement and decision to pause the consideration of the policy recommendations**.
 - In the [The Hague Communiqué](#) (20 June 2022), while looking forward to the “*timely completion of the ‘proof of concept’*”, the GAC emphasized “*the importance of providing specific timelines and goals*” for this work and clarifying “*what will happen after the ‘proof of concept’ phase concludes*”.
 - The **GNSO Council** adopted the [addendum](#) (7 Nov. 2022) to the SSAD ODA Small Team [Preliminary Report](#) (4 April 2022) and expressed being “*supportive of the request that the ICANN Board proceeds with the implementation of the Whois Disclosure System*” in the [GNSO Chair letter to ICANN Board Chair](#) (17 Nov. 2022) consistent with ICANN org's [WHOIS Disclosure System Design Paper](#) (13 Sep. 2022)

⁵ The approach proposed by ICANN org in the SSAD Light Concept Paper was presented to the GAC during the [Pre-ICANN74 ICANN org's briefing to the GAC](#) on 31 May 2022 (GAC website login required)

- On 27 February 2023, the ICANN Board [resolved](#) to **launch the implementation of the WHOIS Disclosure System**, or “Registration Data Request Service” per the associated [announcement](#) (2 March 2023).
- In the [Washington D.C. Communiqué](#) (20 June 2023), the GAC noted **“the importance of maximizing voluntary participation in the system, including through effective outreach and potential incentive structures”** and stressed **“the importance of providing users of the RDRS with easy to access step-by-step training, and guidance”**.
- In the [ICANN Board Comments on the Issues of Importance in the Washington D.C. Communiqué](#) (18 September 2023), the ICANN Board shared **“the same sentiment as the GAC on the importance of maximizing the participation of the users, both from ICANN-accredited registrars and requestors”**. It noted **“that ICANN org has been conducting its various engagement and outreach efforts and will continue to do so up until and beyond the launch of the service”**.
- In the [GAC Hamburg Communiqué](#) (30 October 2023), the GAC recalled that the ICANN Board **“urged the GNSO Council to consider a Policy Development Process or other means to require registrars to use the RDRS”**⁶ and reaffirmed that the GAC **“remains supportive of this idea”**. Observing that **“the RDRS’s success depends in part on how satisfied users are with the system”**, the GAC stressed that a success factor will be **“whether users submitting legitimate requests receive data relating to the underlying registrant as opposed to information related to a privacy or proxy service”**, a risk noted by ICANN in its Operational Design Assessment of the SSAD⁷.
- In the [GAC San Juan Communiqué](#) (11 March 2024), the GAC reiterated that **“widespread use of the pilot by both registrars and requestors will help the RDRS meet its intended purpose”** and stated **“[t]he GAC believes all contracted registrars should participate.”**, encouraging **“ICANN org to conduct a survey of registrars who are not currently participating in the RDRS to gain insights into the concerns of these parties and potential challenges that could be addressed”**. Stressing **“the importance of continued outreach efforts throughout the lifespan of the RDRS to ensure both requestors and registrars are aware of the uses and limits of this pilot program as well as its intended purpose”**, the GAC highlighted **“potential improvements that could help the pilot meet its intended purpose and create an improved user experience”** such as **“unnecessary and confusing elements of the current requester interface, particularly with respect to requests from law enforcement and the applicability of various data protection frameworks”**.
- In the [GAC Kigali Communiqué](#) (17 June 2024) the GAC found that **“the usage of the tool could be further increased, and that the metrics have already shed light on potential improvements that could help the service meet its intended purpose”**, recalled that **“several suggestions for improvement were already formulated in the San Juan Communiqué and stands ready to continue its work on the RDRS Standing Committee to address challenges and maximize the utility of the system for both requestors and**

⁶ see [ICANN Board Resolution on WHOIS Disclosure System Implementation](#) (27 February 2023)

⁷ SSAD Operational Design Assessment (25 January 2022) at pp.19-20

registrars". The GAC reiterated *"the importance of the continued promotion of and education about RDRS to **ensure the community, including both requestors and registrars, are aware of the uses and limits of this pilot program**, as well as its intended purpose, to inform work toward an eventual Standardized System for Access and Disclosure (SSAD)" including by "providing a link to the RDRS via the ICANN registration data lookup tool could help in reaching potential RDRS users who may not be aware of the pilot".* The GAC also encouraged *"registrars to consider making disclosure decisions in response to RDRS requests on behalf of their affiliated proxy service provider"* where a registrar uses an affiliated proxy service provider.

- In the [ICANN Board Comments on Issues of Importance in the GAC Kigali Communiqué](#) (15 October 2024), the ICANN Board noted that *"information on the RDRS has been linked on ICANN's Registration Data Look Up Tool in the section on non-public registration data to increase visibility. A link to RDRS is also included on the results page for the look up tool as well".* Additionally the ICANN Board stated that *"Information and links to the RDRS can be added in the RDAP output of registries and registrars via the GNSO policy development process. The Board encourages the GAC to discuss this option with the GNSO Council"*
- In the [GAC Istanbul Communiqué](#) (18 November 2024) **the GAC reiterated its support for continued operation of the RDRS**, for promoting awareness and usage of the service, implementing improvements to its interface, and to include a link to it within WHOIS/RDAP systems. The GAC also welcomed further work on facilitating voluntary participation of ccTLD managers in RDRS given the significant interest of RDRS users in registration data of ccTLD domain names.
- In addition to the [ICANN Board Comments on Issues of Importance in the GAC Istanbul Communiqué](#) (29 January 2025), following discussions in the January 2025 Board Workshop, and awaiting the GNSO Standing Committee's future report on the RDRS Pilot, **views of the ICANN Board on the future of RDRS were shared with the GAC** and the [RDRS Standing Committee](#) (10 February 2025) **noting** that: a lot has been learned from the RDRS Pilot to date and it is not clear that there is much more to be learned; **the RDRS is a useful tool that should continue to be up and running with some changes** such as: participation by all registrars, Integration of (affiliated) privacy/proxy services into the system, development of requestor authentication mechanisms where appropriate (in particular for law enforcement) and allowing voluntary participation by ccTLDs; **these changes could be informed by policy that is either already available (including EPDP Phase 2 SSAD) or that may need to be developed.**
- Since the beginning of the year, the [GNSO RDRS Standing Committee](#) has been drafting its Final Report consistent with its 4 assignments as laid out in its [Charter](#) (8 Sept. 2023). The Final Report is expected to assist the GNSO Council in its pending consultation with the ICANN Board on the future of the EPDP Phase 2 SSAS recommendations, including whether they should be adopted, rejected, or potentially modified.
- Regarding Recommendation 5 of the [RDRS Standing Committee Report](#) (19 August 2025) regarding next steps on EPDP Phase 2/SSAD Policy Recommendations, the [GAC Comments](#) (29 Sept. 2025) recognized *"that the original package of EPDP Phase 2*

recommendations may benefit from revision in light of RDRS findings [...]” but expressed concerns “that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations [...].”

- **The policy foundation of a new Registration Data Policy regime**, the [Registration Data Policy](#) (21 February 2024) is now published and will become effective on 20 August 2025, **with the exception of provisions related to the timeline for response to Urgent Requests**, for which the Implementation Review Team (IRT) was recently reconvened (see next section on p.11).
 - This Consensus Policy **will become part of ICANN’s contractual requirements for Registries and Registrars within 18 months of its adoption** and replace the current [Interim Registration Data Policy for gTLD](#) (20 May 2019) which currently requires Contracted Parties to continue to implement measures that are consistent with the [Temporary Specification](#) (20 May 2018). **It introduces changes to existing ICANN Policies** which rely on, or relate to Registration Data, including the superseding of the Thick WHOIS transition Policy and revisions of the implementation of the Registration Data Access Protocol (RDAP).
 - **The GAC provided input** at several stages leading to the adoption of this policy:
 - [Input to the ICANN Board](#) (24 April 2019) before its consideration of the GNSO Policy Recommendations from EPDP Phase 1, in which the GAC deemed the *“recommendations to be a sufficient basis for the ICANN Community and organization to proceed - with all due urgency - to the completion of a comprehensive WHOIS model covering the entirety of the data processing cycle, from collection to disclosure, including accreditation and authentication, which would restore consistent and timely access to non-public registration data for legitimate third party interests, in compliance with the GDPR and other data protection and privacy laws”*.
 - Advice to the ICANN Board in the [Montréal Communiqué](#) (6 November 2019), to *“ensure that the current system that requires ‘reasonable access’ to non-public domain name registration is operating effectively”* ([accepted](#) by the ICANN Board on 26 January 2020) and *“to ensure that the ICANN org and the EPDP Phase 1 Implementation Review team generate a detailed work plan identifying an updated realistic schedule to complete its work”*, which were the subject of follow up in the GAC Communiqués of [ICANN70](#) , [ICANN71](#) , [ICANN72](#) , and [ICANN73](#) and related interactions with the ICANN Board⁸.
 - In the latest [GAC Comments](#) (21 November 2022), **the GAC expressed public policy concerns with the proposed Draft Registration Data Consensus Policy for gTLD** including: definition and proposed timelines to respond to urgent requests; collection and publication of reseller data; collection/publication of registration information related to legal entities; need for clear standards around

⁸ See Board GAC Advice Scorecards related to each Communiqué at:
<https://gac.icann.org/activity/icann-action-request-registry-of-gac-advice>

implementation and enforcement; and implementation of a partial system resulting in a policy gap. **The GAC recalled these concerns** in the [Cancún Communiqué](#) (20 March 2023) and in the [Seattle Communiqué](#) (17 March 2025)⁹.

- Based on consideration of input received from 14 community groups, **ICANN org updated the Draft Consensus Policy Language to reflect its analysis of Public Comments** (see [redline version](#) circulated to the IRT on 4 May 2023). ICANN org also provided [responses to public comments](#) (28 April 2023), which discussed some of the GAC input:
 - Regarding the timeline for response to Urgent Requests ICANN’s Implementation Project Team (IPT) *“believes that the 24-hour response time accurately reflects the intent of the EPDP policy recommendations”* (see p.44 of Addendum and section 10.6 of updated consensus policy), but did not extend the definition of urgent requests to include “imminent or ongoing cybersecurity incidents”
 - Regarding the collection and publication of reseller data, *“the IPT believes that making any recommended changes is beyond the scope of the policy as it would create additional changes that are not required by the EPDP Phase 1 recommendations.”*
 - Regarding the policy’s impact on Thick WHOIS, *“The IPT, in consultation with the Implementation Review Team, concluded that ICANN org could enforce a transfer requirement only if the relevant contracted parties agree that a legal basis exists for the transfer and a data protection agreement is in place”*
 - Regarding the Phase 1/Phase 2A policy gap, ICANN org reached out to the GAC Small Group on WHOIS/EPDP with a [memo](#) (5 May 2023) which clarified that:
 - *The functionality of distinguishing between legal and natural persons is beyond the scope of the EPDP Phase 1 IRT*
 - *During the EPDP Phase 2A deliberations, the EPDP Phase 2A Working Group made a policy decision not to mandate the contracted parties to change their practices with regard to data of legal and natural persons*
- In the [GAC Hamburg Communiqué](#) (30 October 2023), the GAC expressed support for the *“Board to separate the topic of Urgent Requests from the publication of the overarching Registration Data Consensus Policy for gTLDs”*
- On 21 February 2024, ICANN published the [Registration Data Policy](#), an ICANN Consensus Policy that describes requirements for Processing Registration Data for each ICANN-accredited Registrar and gTLD Registry Operator. Its effective date is 21 August 2025. In the meantime, the [Interim Registration Data Policy for gTLD](#) (20 May 2019) will remain in effect until 20 August 2025. During the period of 21 August 2024 through 20 August 2025, Registries and Registrars may continue to implement measures consistent with the [Temporary Specification for gTLD Registration Data](#) (20 May 2018) or the new Registration Data Policy in its entirety, or elements of both.

⁹ See Issues of Importance to the GAC, Section IV.3 pp.7-8 and Section IV.1.d pp.8-9 respectively.

- **Agreeing on a timeline for response to Urgent Requests for disclosure of registration data** in “circumstances that pose an imminent threat to life, serious bodily injury, critical infrastructure, or child exploitation” **proved unattainable** in the policy implementation process. **This matter is now subject of two new parallel streams of work** which aim to define an appropriate timeline, assuming a mechanism is developed to authenticate law enforcement requestors
 - At the conclusion of the policy implementation process (August 2023), **ICANN org was planning to publish the proposed [Final Registration Data Consensus Policy](#)** with a time frame for response to Urgent request “*without undue delay, generally within 24 hours*” allowing 2 extensions for a total response time of up to 3 business days.
 - In the [GAC Washington D.C. Communiqué](#) (20 June 2023) the GAC took “*note of ICANN’s summary of public comments on Phase 1 implementation and supports the Implementation Project Team’s suggestion, in line with the GAC’s public comment, to reduce the timeline for urgent requests to twenty-four hours.*”
 - In a [GAC Chair letter to the ICANN Board](#) (23 August 2023), the **GAC expressed its public policy concern with the proposal, and requested the ICANN Board “carefully review the proposed implementation of this particular issue and consider next steps that would achieve an outcome that better meets the public safety considerations posed by urgent requests”**. The GAC also:
 - Observed “*the **tension between the proposed implementation and the concerns conveyed by the GAC during the public comment process.** In this regard, we note ICANN’s commitment to ‘seeking input from the public, for whose benefit ICANN in all events shall act’.*” ([ICANN Bylaws](#), Section 1.2(a)(iv) Commitments)
 - Stressed its belief that **the proposal “is not ready for publication and should be considered further”** while “*the balance of the implementation of the Consensus Policy should move forward*”
 - Highlighted its concerns that “*[t]his outcome calls the effectiveness of the public comment process into question and raises further questions about the interplay between the IRT and the IPT and whether all views, including those put forth by the GAC, have been adequately addressed*”
 - During the [GAC/Board BGIG call](#) (20 September 2023) [GAC website login required] the ICANN Board indicated that it questioned whether the proposal is fit for purpose and consistent with the [ICANN Board Comments on the Issues of Importance in the Washington D.C. Communiqué](#) (18 September):
 - [...] *The Board understands that for most cases of an urgent nature, law enforcement or other parties seeking registration data rely on existing channels including direct contacts with the relevant registry operator and/or registrar. The Board further understands that this may not be possible in all cases, and the policy requirement on responses to urgent requests is to provide a “ceiling” so that when this process is relied upon, these responses have maximum time constraints..*

- ***The Board would be interested in any data the GAC can provide as to experiences of its members in working with contracted parties on requests of an urgent nature, including the channels used and timing for responses provided. [...]***
- **The SSAC, also concerned by these developments, published SAC122, a [Report on Urgent Requests in the gTLD Registration Data Policy](#) (12 Dec. 2023) in which the Security and Stability Advisory Committee noted being “*struck by the incompatibility between the definition of Urgent Requests [imminent threat to life] and the required response times [without undue delay, generally within 24 hours of receipt]*” when “*the expected response time [in such situations] is measured in minutes*”. SSAC **recommends that the policy be substantially reconsidered to become fit for purpose and that, in the meantime, ICANN gathers and shares data about Urgent Requests**, including their frequency of Urgent Requests and registry/registrars practices in responding to them.**
- The [ICANN Board responded to the GAC Chair letter of 23 August 2023](#) (11 Feb. 2024), as well as [to the Registrar Stakeholder Group Chair](#) who [had commented on the GAC letter to the ICANN Board](#) (8 Sep. 2023) noting that “*the Board concluded that it is necessary to revisit Policy Recommendation 18 concerning urgent requests [...] and the manner in which such emergencies are currently handled*” and indicating that “*[f]or this, we believe that consultation with the GNSO Council is required*”.
- In the [GAC Hamburg Communiqué](#) (30 October 2023), “*[b]ecause of the vital public safety interest implicated by Urgent Requests*”, the GAC emphasized “*the need to commence and conclude this implementation work as soon as possible*”, noting further that “*this work should include accreditation issues, among others*”.
- In the [GAC ICANN79 San Juan Communiqué](#) (11 March 2024), **the GAC advised the ICANN Board “to act expeditiously to establish a clear process and a timeline for the delivery of a policy on Urgent Requests for domain name registration data, to respond to the vital public safety interests related to such requests. Such a process must ensure appropriate participation of the community, including the GAC.”** In its [response](#) (5 May 2024) **the ICANN Board determined to “defer[s] action on this advice**, noting that it plans to discuss the way forward on this issue with the GNSO Council.”
- In the [GAC ICANN80 Kigali Communiqué](#) (17 June 2024), **the GAC Followed-up on this Advice and urged “the GNSO Council and the Board to take any necessary steps in an expeditious manner to ‘establish a clear process and a timeline for the delivery of a policy on Urgent Requests for domain name registration data’, given the vital public safety interests related to such requests.”** In response, the ICANN Board determined to continue deferring action on this Advice noting its [correspondence with the GNSO Council](#) and an expected future meeting on this matter between the GAC, PSWG, the ICANN Board and the GNSO.
- In a [follow-up letter to the ICANN Board](#) (15 October 2024), **the GAC Chair proposed to the ICANN Board that two tracks of work be conducted in parallel** to both explore possible mechanisms to authenticate emergency law enforcement requestors and determine an appropriate response time for authenticated Urgent Requests.

- Following subsequent correspondence from the [GNSO Council to the GAC](#) (15 January 2025) and a [trilateral call between the GAC, the ICANN Board and the GNSO Council](#) (12 February 2025), an **agreement was reached among the three parties** that:
 - **The EPDP Phase 1 IRT would be reconvened** to work on defining an appropriate timeline for response to Urgent Requests
 - **A group of practitioners would be convened by the GAC PWSG Co-Chairs** to work on defining mechanisms to authenticate law enforcement requests.
- On 20 February 2025, **the Practitioners Group on Law Enforcement Authentication**, composed of representatives from the GAC, the GNSO and several law enforcement agencies including Interpol, Europol and the FBI, held its inaugural meeting and met several times since. It is expected to meet generally every two weeks and to report on its progress to the GAC, the ICANN Board and the GNSO Council regularly. To date, participants in this group have discussed both a short term and a long term mechanism to provide this authentication for the benefits of Contracted Parties, through existing ICANN systems, the feasibility of which is being considered by ICANN org.
- On 23 April 2025, **the Registration Data Policy Implementation Review Team (IRT) was reconvened**. Considering ICANN Board guidance in an [earlier correspondence to the GNSO Council](#) (3 June 2024) that *“the proposed timeline - whether one, two, or three business days - does not appear to be fit for purpose. To respond to truly imminent threats, a much shorter response timeline, i.e., minutes or hours rather than days, would seem to be more appropriate”*, ICANN advanced a proposal that Contracted Parties respond to Urgent Requests from authenticated law enforcement requestors within 24 hours.
- As of ICANN84, IRT discussion since ICANN83 have resulted in [ICANN org proposed Consensus Policy language](#) (3 October 2025) requiring that Contracted Parties respond to the Urgent Request without undue delay, not to exceed 24 hours, and 72 hours in exceptional circumstances. It is not yet clear whether IRT consensus will be reached on this proposal.
- One particular issue of concern for GAC representatives in the IRT is the process steps and time frame required by ICANN org to make the envisioned Law Enforcement Authentication Mechanisms available to Contracted Parties, thus enabling the enforcement of the 24 hour response time. This issue is expected to be discussed further in the IRT and with ICANN org prior or during ICANN84.

- **Privacy/Proxy Services Accreditation (PPSAI) Policy Implementation** has returned to the fore in light of emerging challenges with these services, now being provided by default to registrants by many leading registrars¹⁰ and following the reconvening of an Implementation Review Team that has been suspended since 2018.
 - Since the entry into force of GDPR and ICANN's Temporary Specification in May 2018, the PPSAI Implementation remained on hold with ICANN org planning to *"allocate resources and finalize a timeline to continue the implementation of PPSAI once the implementation of EPDP Phase 1 is finalized and the design criteria of the EPDP Phase 2 SSAD and Whois Disclosure System are sufficiently stable so that org and the community can identify what synergies can be leveraged with these projects and the PPSAI implementation."*
 - As part of EPDP Phase 1 Implementation, in the so called [Recommendation 27 Registration Data Policy Impacts Wave 1.5 Report](#) (23 February 2021), ICANN org conducted **in-depth analysis of the substantial impact of the Registration Data Policy requirements on the PPSAI recommendations**, and invited the GNSO to consider whether updates of the latter are needed.
 - In the [GAC Comments](#) (16 November 2022) on the [proposed RDAP and Bulk Registration Data Access \(BRDA\) Contractual Amendments](#) the GAC argued that ***"commercial proxy services"*** may need ***"their own data element or entity role"*** in RDAP responses, *"in recognition of the purposes of the RDDS system and the evolving domain name industry"* and the need to include *"all entities inherent to the registrar's domain name registration data distribution channel"*, when they exist, in RDAP query responses.
 - In the [Report of Public Comments](#) (16 December 2022), ICANN org acknowledged the GAC's input, noting that:
 - *The proposed RDAP Profile enables the publication of data elements of which the reseller is included.*
 - *ICANN org will continue to work with the ICANN community to identify how roles and entities are represented in RDDS as part of the policy development process and will work with the contracted parties to update the respective agreements as policies require*
 - *Issues specific to privacy and proxy services will be managed via the implementation of privacy proxy policy recommendations*
 - In the [Cancún Communiqué](#) (20 March 2023) **the GAC advised the ICANN Board:**
 - i. *To prioritize the assessment related to the pending RDS-WHOIS2 Review Recommendation R10.1 which called for the Board to monitor the implementation of the PPSAI policy recommendations, and all necessary steps to resume this implementation, consistent with the intent of the GAC's previous advice.*
 - ii. *To regularly update the GAC on the status of activities related to privacy and proxy services.*

¹⁰ As recognized by the GAC in the Hamburg Communiqué (30 October 2023)

- This advice was discussed during the [Board/GAC Clarification call](#) (11 April 2023) and eventually accepted by the ICANN Board as reported in the [Scorecard of Board Action](#) regarding the Cancún Communiqué (15 May 2023) which noted, at it relates to (i), that *“the assessment is in progress within the org”*.
- In the meantime, the [ICANN Specific Reviews Q1 2023 Quarterly Report](#) (31 March 2023) clarified that *“Recommendation 10.1 aims to provide better data quality and contactability of the underlying contact owner for registrations using affiliated Privacy or Proxy services by requiring registrars to verify and validate the underlying registration data of domain name registrations.”* and stated:
 - *Following further review, the 2013 Registrar Accreditation Agreement (RAA) already includes requirements for registrars to validate and verify registrant contact data of privacy services.*
 - ***ICANN org plans to resume the implementation of Privacy and Proxy Services Accreditation Implementation (PPSAI), which will provide additional explicit requirements to verify and validate registrant contact data of both Privacy and Proxy Services, once the EPDP Phase 1 implementation is completed.***
- In preparation for ICANN78, ICANN org [reported](#) (6 October 2023) considering when and how the implementation work could resume, and invited interested stakeholders for an informal conversation on open questions and options for proceeding. ICANN org further indicated planning to allocate resources to this project once the EPDP Phase 1 implementation is complete.¹¹
- During **informal meetings of interested stakeholders during ICANN78 and ICANN79**, stakeholders discussed the possible need to reconsider the [original GNSO Policy Recommendations](#) (7 December 2015) and the ensuing implementation approach (suspended in 2018) in light of the substantial evolution of data protection law, industry practices and tools. To this end ICANN org presented further analysis [assessing the PPSAI policy recommendations according to an estimated difficulty or level of effort](#) (2 March 2024).
- Since the [call for volunteers](#) (20 May 2024) to reconvene an Implementation Review Team to assist ICANN is assessing the path forward. This work resulted in the formulation and discussion of [“threshold questions” and requests for guidance from the GNSO Council](#) (30 July 2025).
- A [dedicated GNSO Small Team](#) was formed in August 2025 and recently [proposed responses to the IRT Threshold Questions](#) (29 September 2025) for consideration by the GNSO Council during IICANN84.

¹¹ See p.20 in slides of the GDS update to the GNSO Council (22 October 2023)

- **The work of the GNSO Scoping Team on Accuracy of Registration Data** remains paused, while a newly formed [GNSO Small Team on Accuracy](#) (15 May 2025) is expected to consider and recommend next steps to the GNSO Council after ICANN83, taking into account a consultation of ICANN org and ICANN stakeholder groups on a [set of regulatory and “threshold” questions](#) (12 September 2024).
 - The GNSO Council adopted substantive and procedural [instructions](#) for the Scoping Team (22 July 2021). In the [ICANN72 GAC Communiqué](#) (1 Nov. 2021) the GAC welcomed “*the effective start of the accuracy scoping exercise launched by the GNSO*” and expressed support for “*all four assignments*” of the team. The GAC nominated representatives from the European Commission and United States to participate in these [weekly deliberations](#) which started on 5 October 2021.
 - The work of the scoping team was informed by an [ICANN org briefing](#) (26 February 2021), an [ICANN org Memo on the WHOIS Accuracy Reporting System](#) (January 2022) and [ICANN org responses](#) to questions by the Scoping Team.
 - In the [ICANN72 GAC Communiqué](#) (1 November 2021) the GAC reiterated “*that maintaining accurate domain name registration data is an important element in the prevention and mitigation of DNS abuse*”. The GAC also noted that it is “*looking forward to exchanging with other constituencies not only on the definition and measurement of accuracy but also on solutions on how to enhance accuracy. The GAC gives particular importance to the verification, validation and correction of all registration data by registrars, and certain registries, in line with their contractual obligations, and supports rigorous monitoring and enforcement of such contractual obligations by ICANN.*”
 - In the [ICANN73 Communiqué](#) (14 March 2022), the GAC highlighted that as part of the work of the scoping team to date, it “*has emphasized the importance of holding contracted parties accountable for their compliance with the existing accuracy requirements, as well as the importance of increasing transparency about compliance, in order to inform an evidence-based analysis of these issues*”
 - In May 2022, the ICANN org shared with the Scoping Team a [set of scenarios](#) for which it planned to consult the European Data Protection Board on whether or not ICANN org has a legitimate purpose that is proportionate (i.e. not outweighed by the privacy rights of the individual data subjects) to request that Contracted Parties provide access to registration data records for purposes of accuracy verification.
 - In its [preliminary recommendations](#) for the GNSO Council (2 September 2022) the scoping team recommended:
 - **A registrar Survey** be conducted on the status of accuracy of their domains under management (Recommendation 1). In the [ICANN74 Communiqué](#) (20 June 2022), the GAC noted that “*the voluntary nature of the survey [...] could limit the volume of feedback received*” and therefore encouraged “*the team to explore additional and complementary work items, such as testing accuracy controls in a manner that is not dependent upon access to personally identifiable data*”. However, the preliminary report notes that “[a]t this stage, the Scoping Team has not identified sufficient

benefits of moving forward with any of the other proposals that do not require access to registration data [...]".

- **A Registrar Audit** be considered regarding Registrars procedures for determining the accuracy of registration data (Recommendation 2)
- **A pause of scoping team work in relation to proposals that require access to registration data** until feasibility is clearer (Recommendation 3) including through: ICANN org's outreach to the European Data Protection Board (EDPB), a possible Data Protection Impact Assessment to be conducted by ICANN, and the finalization of Data Processing Agreements between ICANN and Contracted Parties.
- **GNSO Council adopted a [motion](#) (17 Nov. 2022) pausing the work of the scoping team and deferring consideration of the recommendations to conduct a survey and an audit** *"until such time the DPA negotiations between ICANN org and Contracted Parties have completed and there is feedback from ICANN org on if/how it anticipates the requesting and processing of registration data will be undertaken in the context of measuring accuracy, or for six months, whichever is the shorter"*.
- In a [GNSO Council letter to ICANN org](#) (1 December 2022), **ICANN org was requested to "Proceed with both (i) your outreach to the European Data Protection Board and (ii) your work on a Data Protection Impact Assessment in connection with the scenario(s) in which the request and processing of registration data takes place as a matter of urgency; Finalize negotiations on the Data Processing Agreement (DPA) as soon as practicable, as the absence of a completed DPA may act as a roadblock for the policy work before the GNSO Council."**
- In a [correspondence to the GNSO Council](#) (14 March 2023) ICANN org reported it has determined that **"a sufficient legal basis exist to proceed"** to conduct **proactive contractual compliance audit(s) of registrar compliance with registration data validation and verification requirements** (Scenario 2), while further, more targeted outreach with European data protection authorities may be required¹² regarding analysis by ICANN of a sample of full registration data for validation and verification of contact data (Scenario 3)
- In the [Washington D.C. Communiqué](#) (20 June 2023), the GAC welcomed *"ICANN org's completion of a Data Protection Impact Assessment (DPIA) on a contractual compliance audit that could shed light on the current state of accuracy"* and sought *"an update on plans to resume the Scoping Team's work"* given that *"over six months have passed since the GNSO adopted a motion to pause the work of the Scoping Team"*. It further proposed that *"further consideration [be given] to activities that may be resumed by the Accuracy Scoping Team"*.
- In a [GNSO Council letter](#) (3 August 2023) sent to ICANN org and Contracted Parties, the GNSO Council indicated it is *"awaiting on the one hand the outcome of the work by ICANN org on the scenario(s) in which the request and processing of registration data takes place and on the other hand the finalization of the Data Processing Agreement (DPA) [...]"*

¹² Consistent with ICANN's previously stated intention to engage with the European Data Protection Board (see [ICANN letter](#) of 2 June 2022 to the European Commission).

- Regarding the completion of DPAs, in the [Washington D.C. Communiqué](#) (20 June 2023), the GAC flagged “it would be helpful to receive quarterly updates on the status of the DPAs”. The ICANN Board responded in its [Comments on the Issues of Importance in the D.C. Communiqué](#) (18 September): “**ICANN org and the Contracted Parties have just a few issues remaining to negotiate. ICANN org will conduct a public comment period on the DPS once negotiations are completed**, so the community can review the terms. Both ICANN org and the Contracted Parties say they remain optimistic the DPS will be in place in time for the implementation of the Registration Data Policy.”
- Before ICANN78, ICANN org shared with the GNSO Council its [analysis](#) (13 October 2023) of [4 scenarios that were previously identified](#) (9 May 2022) as it relates to ICANN’s possibilities for reviewing the accuracy of registration data¹³. In its analysis, **ICANN org concludes that there are several deficiencies and challenges in pursuing the scenarios** and in particular that “ICANN org does not have a legitimate purpose that is proportionate, i.e., not outweighed by the privacy rights of the individual data subject(s) to request Contracted Parties to provide access to individual records as well as bulk access to registration data in order to review the accuracy of registration data”. **Alternatively, ICANN org suggests that the ICANN community considers leveraging historical data of ICANN’s compliance audit program** for assessing current validation and verification requirements under the RAA, **and for contracted parties to analyze existing accuracy and verification practices in Europe “as they weigh how to engage in accuracy policy-related discussions at ICANN”**. ICANN further indicates that “it is compiling these practices and intends to share them with ICANN’s contracted parties to demonstrate the potential for more complex requirements that may come outside ICANN’s multistakeholder model, should the ICANN consensus policy making process be considered ineffective in addressing the issue.”
- In the meantime, the **GNSO Council resolved** (15 February 2024) to **extend “the deferral of consideration of recommendations #1 and #2 of the Registration Data Accuracy Scoping Team [...] for an additional six months”** while committing to “considering the Scoping Team recommendations at an earlier date if DPA negotiations have been completed before six months have passed or another significant event, such as the implementation of the NIS2 directive or the publication Inferential Analysis of Maliciously Registered Domains (INFERMAL) Study, occurs before six months have passed”.
- Following the publication by ICANN of a [draft Data Processing Specifications \(DPS\)](#) applicable to the Registrar Accreditation Agreement and Registry Agreement (29 July 2024), the GNSO Council **resolved** (19 September 2024) to continue “defer[ing] consideration of the Registration Data Accuracy Scoping Team’s Recommendations #1 and #2 for an additional six months while it determines how to make meaningful progress on the topic” while “recogniz[ing] the importance of Registration Data Accuracy to the ICANN

¹³ The four scenarios are as follows: Scenario 1, Analyze publicly available registration data for syntactical and operational accuracy (as was done previously in the WHOIS ARS program); Scenario 2, Proactive Contractual Compliance audit of registrar compliance with registration data validation and verification requirements; Scenario 3, Analyze a (representative) sample of full registration data provided by registrars to ICANN; and Scenario 4, Registrar registration data accuracy survey (voluntary)

community and commits to continue its discussion of how best to move forward on this topic.”

- In response to the GNSO’s regulatory questions, as part of its [Concept Proposal: Structured SG Assignments for Addressing Accuracy Scoping Team Recommendations and Way Forward](#) (12 September 2024), ICANN org [discussed](#) (10 December 2024) legislative efforts and their impact on registration data accuracy obligations, and stressed the view that *“there is no direct conflict between the [NIS2] implementing laws and ICANN policy and contract requirements”*.
- In response the GNSO’s “threshold” questions several GNSO stakeholder groups and Advisory Committees provided their [input](#), including the [GAC Input on GNSO Council Questions regarding Domain Registration Data Accuracy](#) (14 February 2025)
- A [GNSO Council Small Team](#) was formed (15 May 2025) to review this input and other relevant sources, and to recommend to the Council how best to make progress on this topic.
- In the [ICANN83 GAC Prague Communiqué](#) (16 June 2025), the GAC continued to emphasize the importance of accuracy in domain registration data and expressed continued concerns regarding the pause in the work of the Accuracy Scoping Team since 2022. The GAC welcomed *“the preliminary ideas shared during ICANN83 by the GNSO regarding the work of the new GNSO Small Team”* and noted *“with interest the idea to investigate shortening the timeline for registrars to perform registration data validation and verification.”*
- On 14 August 2025, the GNSO Council unanimously approved the [recommendation of GNSO Small Team on Registration Data Accuracy](#) (31 July 2025) to:
 - Examine the existing process for validating and verifying registration data under the 2024 Registrar Accreditation agreement and the potential impact on registrants if this process is modified (Recommendation 1)
 - Create clear and user-friendly educational materials that could be provided before, during, and after domain name registration to educate registrant on the importance of providing and maintaining accurate registration data (Recommendation 2)
 - Further consideration of the Registration Directory Service (RDS) Whois 2 Review Team’s outstanding board-approved recommendation CC.1 regarding the suspension of domain whose contact data is accurate (Recommendation 3)
 - Discontinuing further work of the Accuracy Scoping Team (Recommendation 4)
- For reference, status of the **Review Team recommendations regarding Registration Data Accuracy**, as reported in the ICANN Specific Reviews Q2 2023 Quarterly Report (31 March 2024) and per ICANN Board resolutions on [10 September 2023](#) and [21 December 2023](#) on certain RDS-WHOIS2 Review and SSR2 Review Recommendations, was as follows:
 - **Recommendations 4.1, 4.2 and 5.1 of the RDS-WHOIS2 Review Team [Final Report](#) (3 September 2019) relating to data accuracy monitoring and enforcement** (all identified as “High” priority) **were rejected** in light of: ICANN Compliance already

enforcing existing requirements within the Registry Agreement and RAA provisions; Further community discussions are required to define accuracy and what constitutes a “systemic issue” in registration data accuracy; and ICANN’s assessment of legalities of the associated data processing in its [Assessment of Registration Data Accuracy Scenarios](#) (13 October 2023)

- **Recommendation 9.2 of the SSR2 Review Team [Final Report](#)** (25 January 2021), for ICANN org to **proactively monitor and enforce contractual obligation to improve accuracy of registration data was rejected** (10 September 2023) in light of: ICANN org’s ability to pursue *“accuracy of registration data according to the provisions included in the RA and RAA, and that at present extensive checks are conducted to verify the accuracy of registration data.”*; The Recommendation seeking *“the enforcement of specific compliance requirements (i.e., address fields) regarding data accuracy that are not part of the current registry and registrar contractual framework*; The Recommendation calling for *“work or outcomes that would require the Board to unilaterally modify ICANN’s agreements with registries and registrars, or that would be contingent on community work. Changes to contracted party agreements would be a matter of policy or a result of voluntary negotiations between ICANN org and contracted parties; “ongoing community discussions on registration accuracy”*.

Reminder on the status of other policy issues, policy development and policy implementation processes pending further consideration

- **Policy Development in Phase 2 of the EPDP concluded** with the publication of a [Final Report](#) (31 July 2020), which recommended a System for Standardized Access/Disclosure (SSAD) to gTLD Registration Data with a significant level of divergence among stakeholders as documented in the Consensus Designations (Annex D) and Minority Statements (Annex E), including the [GAC Minority Statement](#) (24 August 2020).
 - **Consensus was achieved on** aspects of the SSAD relating to **accreditation of requestors and centralization of requests** (recommendations 1-4, 11, 13 and 15-17). Once implemented these recommendations should improve the current fragmented systems by providing a central entry point to request access to registration data, according to clearly defined standards, and providing guarantees of appropriate processing.
 - **Stakeholders could not agree on** the policy recommendations necessary to provide for a **System for Standardized disclosure** that meets the needs of all stakeholders involved, including public authorities (recommendations 5-10 and 12). Neither could stakeholders agree on the possibility to evolve the SSAD towards more centralization and more automation of disclosure decisions in the future. (recommendation 18)
 - In the [ICANN70 GAC Communiqué](#) (25 March 2021), the GAC advised the ICANN Board *“to consider the [GAC Minority Statement](#) and available options to address the public policy concerns expressed therein, and take necessary action, as appropriate.”* The Board [accepted](#) the advice (12 May 2021) noting that *“standing on its own, the GAC’s Minority Statement does not constitute consensus advice”*, and included a detailed discussion of issues raised in the GAC Minority Statement on EPDP Phase 2.
 - The GAC issued a [response](#) (6 October 2021) to the Board’s [clarifying questions](#) on the ICANN70 advice that were reiterated before and discussed during the [GAC/Board ICANN71 Communiqué clarification call](#) (29 July 2021)
 - In light of the expected roll out of a pilot Registration Data Request Service (RDRS), the **ICANN Board [confirmed](#)** (9 June 2022) its agreement with the GNSO and **decision to pause the consideration of the EPDP Phase 2 policy recommendations.**

- **Policy Development in Phase 2A of the EPDP** to address the issues of **legal vs. natural persons** and the **feasibility of unique contacts** to have a uniform anonymized email address, **concluded** with the publication of a [Final Report](#) (3 September 2021), a subsequent ICANN [Board resolution](#) (10 March 2023) directing their implementation and recent clarification by ICANN org that *“it will ultimately be up to the technical community to determine [whether] a field will be created to distinguish between legal and natural persons.”*
 - The EPDP Team Chair presented the report as *“a **compromise that is the maximum that could be achieved** by the group at this time under our currently allocated time and scope, and it **should not be read as delivering results that were fully satisfactory to everyone**”* underscoring *“the importance of the minority statements in understanding the full context of the Final Report recommendations”*
 - In its [Minority Statement](#) (10 September 2021), the GAC acknowledged *“the usefulness of many components of the Final Recommendations”* including:
 - *the creation of data fields to flag/identify legal registrants and personal data;*
 - *specific guidance on what safeguards should be applied to protect personal information when differentiating between the domain name registrations of legal and natural persons;*
 - *encouragement for the creation of a Code of Conduct that would include the treatment of domain name registration data from legal entities;*
 - *encouragement for the GNSO to follow legislative developments that may require revisions to the current policy recommendations, and*
 - *useful context and guidance for those who wish to publish pseudonymized emails.*
 - **The GAC** noted however that it *“remains concerned that almost none of the Final Recommendations create enforceable obligations”* which *“fall short of the GAC’s expectations for policies that would require the publication of domain name registration data that is not protected [...] and create an appropriate framework to encourage the publication of pseudonymized email contacts with appropriate safeguards.”*
 - After adoption of these policy recommendations by the GNSO Council, the ICANN Board provided the [bylaw-mandated notification to the GAC](#) (9 Dec. 2021), in [response](#) to which **the GAC requested that the ICANN Board** *“considers [...] the GAC Minority Statement in its entirety, as well as available options to address the outstanding public policy concerns expressed therein.”* (9 Feb. 2022).
 - On 10 March 2022, the ICANN Board [adopted](#) the Phase 2A policy recommendations and directed ICANN org to develop and execute an implementation plan for these resolutions.
 - In the [GAC Comments](#) on the proposed Draft Registration Data Consensus Policy for gTLD (21 November 2022), **the GAC expressed public policy concerns in connection with the implementation of EPDP Phase 1 recommendations without those of Phase 2A**, resulting in a partial system and a policy gap. In response, ICANN org reached out to the GAC Small Group on WHOIS/EPDP with a [memo](#) (5 May 2023) which clarified, inter alia, that *“it will ultimately be up to the technical community to determine [whether] a field will be created to distinguish between legal and natural persons”*

- **Publication of Reseller information in domain registration data**

- The CCT Review [Final Report](#) (8 September 2018) recommended per **Recommendation 17** that ***“ICANN should collect data about and publicize the chain of parties responsible for gTLD domain name registrations”*** which the ICANN Board [accepted](#) (1 March 2019) since *“reseller information is already displayed within the publicly available WHOIS, reliant upon all contracted parties complying with ICANN Consensus Policies and contractual obligations to provide such data”*
- In [GAC Comments on the Final Report and Recommendations of the CCT Review Team](#) (11 December 2018) the GAC endorsed this recommendation, as part of a set of recommendations encouraging the collection of data to ***“allow for more informed decision and policy making, particularly with regard to future standard registry and registrar contract provisions and any subsequent rounds of gTLDs.”***
- In [GAC Comments](#) (21 October 2019) on the [CCT Review Team Accepted Recommendations - Plan for Implementation and Next Steps](#) (11 Sep. 2019), the GAC noted that *“[a]lthough the ICANN Board accepted this recommendation, the proposed implementation plan is not robust. [...] ICANN should take a more active role in educating the community about why this information is necessary in order to track and publish information about DNS Abuse, and spearhead community discussions directed to requiring contracted parties to collect and publish this information in order to promote increased transparency and accountability.”*
- In its [Final Implementation Report](#) (14 September 2022), ICANN org noted that CCT Review **Recommendation 17** ***“has been implemented to the extent possible consistent with current policy requirements”*** and that ***“no further action is required”***. In particular, it referred to the [Advisory: Clarifications to the Registry Agreement, and the 2013 Registrar Accreditation Agreement \(RAA\) regarding applicable Registration Data Directory Service \(Whois\) Specifications](#), published on 12 September 2014 and noted that the Reseller field is *“optional and should be treated as described in the Advisory”*. It in fact a subsequent Advisory, which superseded the previous version, the [Advisory: Clarifications to the Registry and Registrar Requirements for WHOIS \(port 43\) and Web-Based Directory Services](#) published on 27 April 2015 and last updated on 25 May 2018, which states:

50. The value section of the "Reseller" field SHOULD be shown, but MAY be left blank or the whole field MAY not be shown at all. If shown, the value of the field MUST be the name of the organization, in case the Reseller for the name is a legal entity, or a natural person name otherwise.
- In the context of the phasing out of the WHOIS protocol and its replacement by the Registration Data Access Protocol, in [GAC Comments on the proposed Registration Data Access Protocol \(RDAP\) and Bulk Registration Data Access \(BRDA\) Contractual Amendments](#) (16 November 2022), the GAC noted that the [RDAP Response Profile](#) provides that *“the returned domain object in the RDAP response MAY contain an entity with the reseller role, if the domain name was registered through a reseller.”* It further stressed that *“In recognition of the purposes of the RDDS system and the evolving domain*

name industry, the GAC supports the inclusion of all entities inherent to the registrar's domain name registration data distribution channel. Such entities should be included in an RDAP query response, when they exist."

- In response, in its [Public Comment Summary Report](#) (16 December 2022), ICANN org acknowledged the GAC's comment and noted *"that ICANN org will continue to work with the ICANN community to identify how roles and entities are represented in RDDS as part of the policy development process and will work with the contracted parties to update the respective agreements as policies require."*
- As part of a [Public Comment proceeding on the proposed draft Registration Data Consensus Policy](#), in a [GAC Comment on the Draft Registration Data Consensus Policy for gTLDs](#) (21 November 2022), the GAC suggested that instead of "6.4 Registrar MAY generate the Reseller data element value." the policy should read "6.4 Registrar SHOULD generate the Reseller data element value, for the Reseller with a direct relationship with the Registrant." The GAC observed that "the domain name industry has evolved considerably since ICANN's inception, and today includes roles and entities which may not have existed in previous RDDS systems; similarly, new entities may be created tomorrow which have yet to be conceived of today. In recognition of this, **the GAC supports the inclusion of corporate entities inherent to the registrar's distribution channel** (such as the RDAP Response Profile entity 2.5 enumerating the "reseller" role) **as it is the purpose of the RDDS system to enumerate roles and responsibilities relevant to domain name registrations**; such entities should be included in an RDAP response, when they exist. This would also prove as a benefit in highlighting the **best point of contact to deal with notifications of abuse or compromise to the party with the ability to act the quickest or most appropriately**".
- In its Review of Public Comments (28 April 2023) as appended to the original [Public Comment Summary Report](#) (20 January 2023) [see after p.39], ICANN org stated:

"After careful consideration of the public comments received, the IPT determined that additional changes should not be made to the policy language pertaining to the requirements related to the reseller field. There is no indication that the draft policy was drafted incorrectly, and the EPDP Phase 1 team determined that the collection, transfer, and publication of the reseller field remain optional. The draft policy language maintains the status quo as org recognizes that current business practices allow for the optional collection, transfer, and publication of the reseller field. Thus, the IPT believes that making any recommended changes is beyond the scope of the policy as it would create additional changes that are not required by the EPDP Phase 1 recommendations.

Key Reference Documents

- Registration Data Request Service (RDRS)
 - [GAC Comments](#) (29 Sept. 2025) on the [RDRS Standing Committee Report](#) (19 August 2025)
 - [RDRS Usage Metrics Reports](#) (since December 2023)
 - [Addendum](#) (7 Nov. 2022) to the SSAD ODA Small Team [Preliminary Report](#) (4 April 2022) regarding requirements for an SSAD proof of concept.
 - [WHOIS Disclosure System ICANN Design Paper](#) (13 Sep. 2022)
- Urgent Requests for disclosure of registration data
 - Latest [ICANN org proposed Consensus Policy language](#) (3 October 2025)
 - [GNSO Council Follow-up - Clarifying Question and Additional Considerations, to GAC Chair](#) (15 January 2024)
 - [GAC Chair to ICANN Board](#) (15 October 2024)
 - [GNSO Council response to the ICANN Board](#) (29 August 2024)
 - [ICANN Board letter to the GNSO Council](#) (3 June 2024)
 - [GAC Chair letter to the ICANN Board Chair](#) (23 August 2023) on the timeline for response to Urgent Request in the proposed Final Registration Data Consensus Policy, and [ICANN Board response](#) to the GAC Chair (11 February 2024).
- Policy development on gTLD Registration Data (EPDP Phase 1, 2, 2A)
 - [ICANN org Review of Public Comment](#) (28 April 2023) - starting p.40 - on the [Draft Registration Data Consensus Policy for gTLDs](#) (24 August 2022)
 - [GAC Comments](#) (21 November 2022) on the [Draft Registration Data Consensus Policy for gTLDs](#) (24 August 2022)
 - [Draft Registration Data Consensus Policy for gTLDs](#) (24 August 2022)
 - ICANN org [Operational Design Assessment of the SSAD](#) (25 January 2022)
 - [GAC Minority Statement](#) (10 Sep. 2021) on EPDP Phase 2A [Final Report](#) (3 Sep. 2021)
 - [GAC Minority Statement](#) (24 August 2020) on EPDP Phase 2 [Final Report](#) (31 July 2020)
- Accuracy of Registration Data
 - [ICANN Compliance Presentation on the Enforcement of accuracy-related requirements](#) (15 October 2025) during a GAC Pre-ICANN84 Webinar
 - [Recommendations](#) (31 July 2025) of the [GNSO Small Team on Registration Data Accuracy](#), adopted by the GNSO Council (14 August 2025)
 - [Assignment](#) and [deliberations](#) of the GNSO Small Team [on Accuracy](#) (15 May 2025)

- [GAC Input on GNSO Council Questions regarding Domain Registration Data Accuracy](#) (14 February 2025) and [input from other Advisory Committees and Stakeholder Groups](#).
- [ICANN org response to GNSO Council regulatory questions](#) (10 December 2024)
- ICANN org [Assessment of Registration Data Accuracy Scenarios](#) (13 October 2023)
- [ICANN Org Correspondence to the GNSO Council](#) regarding the Registration Data Accuracy Scoping Team (14 March 2023)
- Accuracy Scoping Team [preliminary recommendations](#) to the GNSO Council (2 Sep. 2022)
- [ICANN org Update to the Accuracy Scoping Team](#) on scenarios for EDPB engagement (9 May 2022)
- GAC Communiqué and Board response
 - [ICANN83 Prague Communiqué](#) (16 June 2025) Issues of Importance related to the Urgent Requests, RDRS, Accuracy of Registration Data; as well as:
 - [ICANN Board Comments](#) on the Issues of Importance (1 October 2025)
 - [ICANN82 Seattle Communiqué](#) (17 March 2025) Issues of Importance related to the Urgent Requests, RDRS, Accuracy of Registration Data, and Other Public Policy Concerns Regarding Registration Data; as well as:
 - [ICANN Board Comments](#) on the Issues of Importance (4 April 2025)
 - [ICANN81 Istanbul Communiqué](#) (18 November 2024) Issues of Importance related to the RDRS, Privacy/Proxy Accreditation Policy Implementation, Registration Data Accuracy, and Urgent Requests; as well as:
 - [ICANN Board Comments on the Issues of Importance](#) (29 January 2025)
 - [ICANN80 San Juan Communiqué](#) (11 June 2024) Follow-up on Previous Advice regarding Urgent Requests, and Issues of Importance related to the RDRS, Registration Data Accuracy, and Privacy/Proxy Accreditation Policy Implementation; as well as:
 - [Scorecard of Board Action](#) regarding the Follow-up on Previous Advice regarding Urgent Requests (7 September 2024)
 - [ICANN Board Comments on the Issues of Importance](#) (15 October 2024)
 - [ICANN79 San Juan Communiqué](#) (11 March 2024) GAC Advice on Urgent Requests, and Issues of Importance related to the RDRS, Privacy/Proxy Accreditation Policy Implementation, and Registration Data Accuracy; as well as:
 - [Scorecard of Board Action](#) regarding Advice in the San Juan Communiqué (5 May 2024)
 - [ICANN Board Comments on the Issues of Importance](#) (9 May 2024)

- [GAC Washington D.C. Communiqué](#) (20 June 2023) Follow up on Previous GAC Advice on Privacy Proxy Services; and Issues of Importance in the on the Registration Data Consensus Accuracy, the RDDS and the Registration Data Consensus Policy, as well as:
 - [Scorecard of Board Action](#) regarding Advice in the D.C. Communiqué (10 Sep. 2023)
 - [ICANN Board Comments on the Issues of Importance](#) (18 September 2023)
- GAC Advice in the ICANN76 [Cancún Communiqué](#) (20 March 2023) on Privacy/Proxy Services, and the related
 - [Summary Notes](#) of the Board/GAC Clarification Call (11 April 2023)
 - [Scorecard of Board Action](#) regarding Advice in the GAC Cancún Communiqué
- GAC Advice in the [GAC ICANN72 Communiqué](#) (1 Nov. 2021) and related ICANN Board [Scorecard](#) (16 January 2022)
- GAC Advice in the [GAC ICANN71 Communiqué](#) (21 June 2021) and related ICANN Board [Scorecard](#) (12 September 2021)
- GAC Advice in the [GAC ICANN70 Communiqué](#) (25 March 2021), related ICANN Board [Scorecard](#) (12 May 2021) and [GAC Response to ICANN Board Clarifying Questions](#) (16 Nov. 2021)
- [GAC Response](#) (6 October 2021) to [ICANN Board Clarifying Questions](#) (21 April 2021) on the ICANN70 GAC Advice regarding the GAC Minority Statement on EPDP Phase 2, as reiterated during the ICANN71 Communiqué clarification discussions.

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Governmental Advisory Committee Comments on the Registration Data Request Service (RDRS) Standing Committee Report

These GAC comments are proposed in response to the [ICANN Public Comment proceeding](#) on “Registration Data Request Service Standing Cmte. Report for GNSO Council Review” opened on 19 August 2025 and closing on 29 September 2025.

Introduction

The ICANN Governmental Advisory Committee (GAC) welcomes the opportunity to provide comments on the Registration Data Request Service (RDRS) Standing Committee Report. GAC members have reviewed ICANN org’s draft planning documents and herein provide comments on aspects of this work relevant to its constituent members. The GAC thanks ICANN org staff and the members of the RDRS Standing Committee for their work during the RDRS pilot period.

At a high level, it remains the view of the GAC that a functioning system enabling lawful access and submission of disclosure requests regarding domain name registration data is essential to ICANN’s mission of ensuring “*the stable and secure operation of the Internet’s unique identifier(s)*”.¹ Lawful access to registration data “*helps achieve many such public policy interests, including enhancing trust in the DNS, ensuring consumer protection, protecting intellectual property, combating cyber-crime, piracy and fraud.*”² Achieving such a permanent functioning system should therefore be prioritised by ICANN org.

The GAC recognizes that this report does not exist in a vacuum; ongoing ICANN community discussions help to inform the GAC’s view. The RDRS is acknowledged to have been created as an intermediary system, a pilot, which did not aspire to meet the full suite of requirements laid out for a more permanent Standardized System for Access and Disclosure (SSAD) by the Final Report of the Temporary Specification for gTLD Registration Data Phase 2 Expedited Policy Development Process (EPDP Phase 2)³. Until the implementation of a permanent system for centralized disclosure requests, the GAC appreciates that, as noted by the RDRS Standing Committee, the RDRS has shown itself to be a “*somewhat useful... stopgap, providing value to users*”⁴. Thus, this GAC comment may be considered to address both issues important to

¹ See [ICANN Bylaws](#), Section 1.1(a)

² See [ICANN61 GAC San Juan Communiqué](#) (15 March 2018), rationale of GAC Consensus Advice to the ICANN Board “on GDPR and WHOIS”, p.8

³ <https://gnso.icann.org/en/correspondence/epdp-phase-2-temp-spec-gtld-registration-data-2-31jul20-en.pdf>

⁴ See [RDRS Standing Committee Report](#), p. 5

improving the RDRS's near-term utility, as well as *"lessons learned that should be factored into consideration of how to proceed with the SSAD"*.

General Comments: Review of the Standing Committee Recommendations to the GNSO Council

Recommendations Expected but Not Observed

It remains the GAC's view that the RDRS *"should be made mandatory for all gTLD registrars to increase its utility."*⁵ The GAC notes that within the SC report, in discussion of the "Lesson Learned: Participation" (p. 32), *"SSAD was considered as a mandatory system. RDRS is based on voluntary participation. Optional registrar participation resulted in approximately 60% of gTLD domains under managements available [at the height of registrar participation]. The limited participation of registrars may have resulted in reduced requestor participation."* Mandatory registrar participation is needed, especially if ICANN ultimately pursues iterative improvement of the RDRS rather than following the original SSAD Operational Design.

To that end, the GAC would appreciate action by the SC to incorporate such a recommendation.

Recommendation 1: Continue the RDRS beyond the pilot period.

As recently as ICANN83 the GAC has expressed its concurring view calling for *"the RDRS to continue operating beyond its pilot period and for enhancements to be made to the RDRS as previously identified by both the ICANN Board and the GAC including improved integration for requests related to privacy and proxy services."*⁶ The GAC considers it important that ICANN maintain and continue improving the RDRS and notes that an adequately improved RDRS could potentially become the permanent solution for centralized disclosure requests.

Recommendation 2: Allow for authentication of interested requestor groups, beginning with law enforcement.

As noted most recently in its ICANN83 Prague Communiqué, *"the GAC notes that work on authentication solutions for law enforcement requestors is proceeding..."* and *"that one important enhancement to the RDRS would be to ensure it can incorporate these future authentication solutions."*⁷

The GAC supports such efforts.

Recommendation 3: Implement Key System Enhancements to sustain and evolve RDRS post-pilot while more policy work is underway.

As noted in the GAC communication captioned under Recommendation 1 above, the GAC supports ongoing enhancements to be made to the RDRS as previously identified by both the ICANN Board and the GAC, to include API integration, User Experience (UX) improvements, and support for the onboarding of voluntary ccTLD operator participation.⁸ The GAC finds that any future UX/UI changes should focus on reducing user friction, designed in consultation with user communities (including law enforcement requestors).

⁵ See [ICANN83 GAC Prague Communiqué](#) (16 June 2025), Section IV.1.a, p. 5

⁶ *ibid.*

⁷ *ibid.*

⁸ See [ICANN Board Comments](#) (4 April 2025) regarding the ICANN82 GAC Seattle Communiqué Issues of Importance 1.b (17 March 2025)

The GAC notes with concern that recommendation 3 states that *“ICANN org does not plan to add enhancements to the RDRS while further discussions between the GNSO Council and ICANN Board are ongoing”*. Since the RDRS continues to be operational, swiftly implementing system enhancements that have been discussed as necessary in the community for some time is essential for the usability of the system and ultimately to increase usage by requestors.

The GAC would therefore request that the SC report explicitly includes a recommendation to the ICANN Board to that effect.

Recommendation 4: Consider further policy work in the following areas.

4.1. Privacy/Proxy Data

The GAC understands that many leading registrars provide privacy/proxy services to registrants by default, yet not all of those registrars consider providing data of the underlying privacy/proxy customer when responding to a RDRS disclosure request. Thus, as communicated previously by the GAC in statements such as the ICANN82 Seattle communique, quoted here, the GAC believes the RDRS *“system’s ability to address requests for data underlying privacy and proxy registrations should be improved.”*

The GAC supports efforts seeking improvement in this area.

4.2. Inclusion of RDRS links in RDAP responses

As noted most recently in the GAC’s ICANN83 Prague Communique, *“Promoting awareness and education regarding the RDRS should also remain an important priority. To that end, it may be warranted to contemplate policy requiring links to RDRS (or successor systems) from Registration Data Directory Services that Contracted Parties are required to provide.”* The GAC appreciates this recommendation, and considers it among the most important steps that can be taken to raise awareness of the RDRS to all users of WHOIS and RDAP registration data directory services.

The GAC is thus supportive of this line of effort.

Recommendation 5: Consideration regarding next steps on EPDP Phase 2/SSAD Policy Recommendations

Among other items, the GAC notes this recommendation states: *“Council should recommend that the ICANN board reject the SSAD recommendations (as a package) and send them back to the GNSO Council for further action and Supplemental Recommendation.”*

The GAC recognizes that the original package of EPDP Phase 2 recommendations may benefit from revision in light of RDRS findings, especially as pertains to allowing for more cost effective authentication of key requestor groups.

However, the GAC has concerns that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations, including ones the RDRS Standing Committee expressly supported.

Further, the GAC calls for measures to ensure the ultimate result is progress toward the Board’s previously expressed goals of:

- Making RDRS participation mandatory for all gTLD registrars, which the Board has suggested could be done based on an existing EPDP Phase 2 policy recommendation;
- Continuing RDRS operation past its pilot period “until missing policy elements are in place”;
- Better facilitating requests through RDRS for the data underlying registrations made with a privacy or proxy service, especially when the service is affiliated with an ICANN-accredited gTLD registrar;
- Developing a policy requirement for privacy and proxy service providers affiliated with registrars to participate in RDRS;
- Developing a mechanism that allows for authentication or accreditation of requestors;
- Creating APIs for both registrars and requestors to facilitate greater ease of use and integration of RDRS into existing processes for registrars;
- Considering options to enable voluntary participation by ccTLD operators, given requestor interest in ccTLD participation but also challenges related to technical compatibility and diverse national policies affecting ccTLDs.

With regards to the Table of potential modifications to be made to the “18 SSAD policy recommendations”:

SSAD Recommendation #6: Priority Levels.

The GAC supports the suggestion from the RDRS Standing Committee that “urgent requests” should be listed as an option when requestors identify the priority level of their disclosure request in RDRS.

The GAC encourages swift implementation of this suggestion.

SSAD Recommendation #9: Automation of SSAD Processing.

The GAC disagrees with the conclusions drawn by a portion of the rationale text, specifically, the text reading:

“The pilot indicated that human review is still needed for each request, and introducing automation would add significant cost and complexity. The SC concluded that full automation is currently infeasible due to the need for nuanced human judgment in balancing privacy and disclosure rights.”

The GAC agrees that a balancing of privacy and disclosure rights is expected, but notes that this balancing test can in many cases be addressed by forethought. For example, if a registrar frequently receives lawful requests from an authenticated, local public safety agency, who attest they are making the request as part of their official duties, that registrar might decide that the sum of these circumstances is sufficient to decide in favor of disclosure. Thereafter, potential automation of such requests could significantly *lower* the cost of fielding those requests. Similarly, a registrar might wish to automate *non-disclosure* responses when receiving incomplete requests, communicating back to the requestor which of the necessary request elements were missing. This, too, could save money when fielding high request volumes. There is no aspect of automation which inherently prevents the balancing test from being conducted, so long as the same considerations are made pre-emptively as would have been done reactively.

Recommendation 6: Maintain the current Standing Committee with narrowed Scope.

The GAC supports maintaining the SC (whether formally or informally) as a resource for further community work as needed.

Closing

The GAC is grateful to ICANN org for this opportunity to share its perspective on the RDRS SC Final Report and looks forward to contributing to continued community discussions.