ICANN | GAC
Governmental Advisory Committee

ICANN 87 ANNUAL GENERAL MEETING

Registration Data Issues

Session 7

Contents

Session Objective	p.1	Leadership Proposal for GAC Action	p.2	Current Status and Recent Developments	p.4	Key Reference Documents	p.31

GAC Plenary Session Objective

This session aims to discuss status and consider possible next steps for the GAC in relation to the WHOIS/Registration Data policy framework, taking into account relevant Data Protection law.

The GAC will discuss latest developments and related policy concerns, in connection with:

- Status and next steps regarding the ongoing development of law enforcement requestor authentication mechanisms to enable implementation of the 24-hour timeline for Contracted Parties to respond to Urgent Requests for disclosure of registration data
- Progress of the implementation of the Privacy/Proxy Services Accreditation Policy Recommendations (PPSA) in the coming year.
- Modification of the GNSO policy recommendations for a System for Standardized Access/Disclosure (SSAD) adopted in 2021 to reflect lessons learned and Community input from operations of the Registration Data Request Service (RDRS) to date;
- Status of discussions on the revisiting of the 15-day timeline for registrars to verify registrants contact information.

Leadership Proposal for GAC Action

1. **Assess progress on the development of law enforcement requestor authentication mechanisms,** in collaboration with ICANN org and community representatives as part of a newly formed Input Group**, as a dependency to ensuring that the 24-hour response timeline becomes enforceable** on all gTLD Registries and Registrars as soon as possible, following its recent publication of the updated Registration Data Policy as as part of ICANN Consensus Policies.

2. **Consider proposed modifications to the 2020 policy recommendations for a System for Standardized Access/Disclosure (SSAD)** in an expected Public Comment proceeding after ICANN87, on outputs of the GNSO SSAD Supplemental Recommendations Team (SRT), 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 resolution (30 October 2025) on the continuation of the RDRS for up to 2 years "while the community continues its deliberations regarding the future of the service and related policy recommendations", urging "*the GNSO Council to ensure that future policy work on the System for Standardized Access/Disclosure (SSAD) recommendations is aligned with policies related to requests for underlying registration data for domains registered under privacy and proxy services, an enforceable timeline for urgent requests, and other relevant procedures*."

    c. GAC Comments (15 December 2025) on the ICANN org RDRS Policy Alignment Analysis in which the GAC expressed support for the proposed enhancements of RDRS which it considers shared goals with the ICANN Board, including:

        i. Mandatory registrar participation, as presumed under most adopted consensus policies;

        ii. A requirement for registrars with affiliated privacy and proxy services to also respond to RDRS requests for underlying privacy/proxy customer contact data as part of their disclosure decision process;

        iii. Better integration for registrars' systems and requestors' systems with the request portal;

        iv. Operational options for country code top-level domains (ccTLDs) to voluntarily participate in the RDRS or a successor system

    d. The assignment of the SSAD Supplemental Recommendations Team

3. **Consider the** proposed Draft ICANN Consensus Policy **in implementation of the Privacy/Proxy Services Accreditation (PPSAI) Policy Recommendations** which aim to create a framework to standardize business practices including regarding disclosure of underlying registration data when such services are involved in domain name registration.

4. **Examine possible paths for progress on accuracy of registration data** in gTLDs, including changing the current **15-day timeline for verification by registrars of registrant's contact information**, following the ICANN86 discussion of this matter with the GNSO (9 June 2026), a pre-ICANN87 call between GAC and Registrar Topic Leads (28 September 2026) and in line with the GAC Dublin Communiqué (3 November 2025), the GAC Mumbai Communiqué (16 March 2026), and the Seville Communiqué (15 June 2026), where the GAC:
    a. Reaffirmed interest in reviewing the current rules, particularly ahead of the delegation of new gTLDs strings, taking into account all relevant aspects of this issue, including potential operational and financial challenges to registrars
    b. Recommended that registrars be required validation and verification of registration data before a newly registered domain name can become accessible through the DNS,
    c. Encouraged ICANN org undertake a holistic assessments of the evolution of technologies and registration practices that may affect the accuracy and reliability of domain registration data,
    d. Proposed that a possible path to be further explored in this regard is contract amendments, while the GAC continues to consider the best path for efficient implementation.
    e. Called for the ICANN community to maintain an active forum in which to continue discussing possible next steps related to accuracy.

Current Status and Recent Developments

This section is subdivided to address the following topics

- The Registration Data Request Service (RDRS) - **pp. 5-6**
- Feasibility of a permanent System for Standardized Access/Disclosure of Registration Data (SSAD) - **pp. 7-11**
- The Registration Data Policy - **pp. 12-13**
- Urgent Requests for disclosure of Registration Data - **pp. 14-17**
- Privacy/Proxy Services Accreditation (PPSAI) Policy Implementation - **pp. 17-19**
- GNSO work on Accuracy of Registration Data (including discussion of the 15-day verification timeline) - **pp. 20-25**
- Reminder on the status of other policy issues, policy development and policy implementation processes pending further consideration, including:
    - Policy Development in Phase 2 of the EPDP on Registration Data - **p. 26**
    - Policy Development in Phase 2A of the EPDP to address the issues of legal vs. natural persons and the feasibility of unique contacts - **p. 27-28**
    - Publication of Reseller information in domain registration data **- pp. 29-30**

- **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 more than 2 years of usage data[1]**. The GAC has consistently called "for measures to ensure the ultimate result is progress toward the ICANN Board's previously expressed goals, including making RDRS participation mandatory for all gTLD registrar** and continuing RDRS operation past its pilot period "until missing policy elements are in place"

    - In the ICANN82 GAC Seattle Communiqué (17 March 2025), **the GAC** 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 RDRS Standing Committee recommendations to the GNSO Council**, including:
        - Rec. 1: Continue the RDRS beyond the pilot period.
        - Rec. 2: Allow for authentication of interested requestor groups, beginning with law enforcement.

[1] See monthly Registration Data Request Service Usage Metrics since the launch of the service, available at https://www.icann.org/rdrs-en. 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.

- Rec. 3: Implement Key System Enhancements to sustain and evolve RDRS post-pilot while more policy work is underway.
- Rec. 4: Consider further policy work in specific areas such as privacy/proxy data and the inclusion of RDRS links in RDAP responses
- Rec. 6: Maintain the current Standing Committee with narrowed Scope.

- On 30 October 2025, the ICANN Board resolved to:
  - ***continue operations of the RDRS for a period of up to two years**, until December 2027, **while the community continues its deliberations regarding the future of the service and related policy** recommendations*.
  - *continue to engage with the GNSO Council and the GNSO Standing Committee on any **further enhancements to the service during this period.***
- In the GAC Dublin Communiqué (3 November 2025), the GAC called for "*efforts to **ensure adequate and timely improvements to the RDRS to reassure the community that it can evolve into such a permanent, centralized, and globally accessible mechanism**. The absence of an adequate centralized system creates inefficiencies, as requestors such as law enforcement agencies would need to approach each registrar independently*"
- **The GNSO Council** resolved (11 December 2025) to "***accept[s] the RDRS SC Findings Report*** [Final RDRS Standing Committee Report, 10 November 2025] *as helpful empirical input **to inform future deliberations** within the GNSO **regarding the next steps on the EPDP Phase 2 SSAD Recommendations** [...]"*

- **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 GNSO Council has now started**, following the "non-adoption" the ICANN Board of the original GNSO EPDP Phase 2 SSAD Recommendations, **to deliberate on modification of the original SSAD recommendations**, consistent with Recommendations from the GNSO RDRS Standing Committee (10 November 2025) and ICANN org's RDRS Policy Alignment Analysis (30 October 2025), as urged to so by the ICANN Board (30 October 2025).
    - 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)[2]. 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)

[2] 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*"**[3] 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 SSAD[4].
- In the GAC San Juan Communiqué (11 March 2024), the GAC reiterated that "***widespread use of the pilot by both registrars and requesters 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 requesters 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 Commununiqué (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*

[3] see ICANN Board Resolution on WHOIS Disclosure System Implementation (27 February 2023)
[4] 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 Commununiqué (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; t**he 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**.
- Over the first semester of 2025, 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). This report was aimed to assist the GNSO Council in its pending consultation with the ICANN Board on the future of the EPDP Phase 2 SSAD recommendations, including whether they should be adopted, rejected, or potentially modified.

- In response to **Recommendation 5** of the Preliminary 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 [...]"*
- As part of its resolutions (30 October 2025) to continue operations of the RDRS for a period of up to two years, **the ICANN Board also urged the GNSO Council:**
  - **To ensure that future policy work on the SSAD recommendations is aligned with policies related to requests for underlying registration data** for domains registered under privacy and proxy services, an **enforceable timeline for urgent requests**, and other relevant procedures.
  - To consider the RDRS Policy Alignment Analysis (30 October 2025) in its future consultation with the ICANN Board on the EPDP Phase 2 policy recommendations.
- GAC Comments (15 December 2025) on the ICANN org RDRS Policy Alignment Analysis laid out the **GAC expectations**, **that modification of the EPDP Phase 2 SSAD recommendations to achieve the expected improvements shared between the ICANN Board and GAC be done swiftly** and that *"[s]hould the GNSO ultimately not deem it feasible to utilize the policy paths identified within this document to achieve these goals, the GAC would anticipate and support the pursuit of these goals by other means, which could include but may not be limited to new policy development processes or contract amendments*"
- During ICANN85, **the ICANN Board and GNSO Council were expected to take the necessary steps to launch the process** described in the ICANN Bylaws, Annex A, Sec. 9 **which provides for possible modification of GNSO Policy Recommendations** (Supplemental Recommendations). This process was discussed in the GNSO Council in January 2026 and an initial dialogue with members of the ICANN Board took place in the GNSO Council meeting on Thursday 12 February (see Agenda Item 5). Eventually, the ICANN Board resolved to not adopt the original SSAD Recommendations (12 March 2026).
- Prior to ICANN86, the GNSO convened a SSAD Supplemental Recommendations Team (SRT) **including two GAC representatives from the GAC Small Group on Registration Data: David Bedard (Canada) and Owen Fletcher (United States)**. The group is expected, according to its GNSO Council Assignment, to propose modifications to the original 18 SSAD recommendations "based on the recommendation rationale provided in the [RDRS] Standing Committee's Final Findings Report" **by February 2027.**
- **The SSAD SRT** has been meeting several hours every week since before ICANN86 and has gone through several readings of the proposed modified SSAD recommendations before these can be finalized and published for community review after ICANN87. The SRT will

meet for a full day prior to the start of ICANN87 (Thursday 15 October) and will meet three times during ICANN87 (Saturday 17 at 16:30, Mon. 19 at 15:00 and Wed. 21 October at 16:30 local time)

- Based on previous GAC Input, **the GAC's representatives in this process (Canada and United States), are currently making a case for modifications** in several recommendations, and key modifications in the following recommendations:
  - Recommendation 1 on Authentication of SSAD Users
  - Recommendation 3: Criteria and Content of Requests
  - Recommendation 6: Request Types and Service Level Agreements
  - Recommendation 8: Contracted Party Disclosure Decision

- **The policy foundation of a new Registration Data Policy regime,** the Registration Data Policy (21 February 2024) became 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 Board[5].
        - 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 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)[6].

[5] See Board GAC Advice Scorecards related to each Communinqué at: https://gac.icann.org/activity/icann-action-request-registry-of-gac-advice

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

- 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 person*s
- 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.

- **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. **Agreement was eventually reached on a 24-hour response timeline, while work continues** in the context of a trilateral dialogue between the GAC, the ICANN Board and the GNSO, on the development of authenticate law enforcement requestors, and which were established.
    - 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 generals 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 Paries response to Urgent Requests from authenticated law enforcement requestors within 24 hours.
- Shortly before ICANN84, ICANN org published for Public Comment the proposed Consensus Policy language (22 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.
- In its Comments (15 December 2025) on this proposal, the GAC recalled the ICANN84 GAC Dublin Communiqué (3 November 2025) which noted that "***the current proposal for a 24-hour timeline to address Urgent Requests, with potential extension to 72 hours in cases of force majeure, is in line with previous positions expressed by the GAC and the ICANN Board***"
- The report of public comments (14 January 2026) did not confirm whether the proposed policy language was final, nor did it determine among several possibilities, what would be 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.
- On 12 May 2026. ICANN published the updated Registration Data Policy as part of ICANN Consensus Policies to include the 24-hour expedited response timeline for Urgent Requests, noting that the effective date for this requirement will be determined following finalization of the authentication mechanism for requestors.

- An ICANN org led Input Group was recently charted to develop "*a proof of concept for an operationally effective approach to authenticating law enforcement agents who submit requests through the Registration Data Request Service (RDRS) or its successor system.*" which is expected to enable the Urgent Request part of the Registration Data Policy to become effective (Implementation Note K: *The obligations under Section 10.7 will become effective on the date that ICANN fully implements a Consensus Policy that establishes a process for authentication of a requestor*)

- As it relates to Authentication of Law Enforcement Requestors for Urgent Requests, the SSAD SRT is expected by the GNSO Council to address the EPDP Phase 1 Rec. 18 policy gap regarding the "authentication" part of the solution for timely response to Urgent Requests (letter from the GNSO Council chair 29 April 2026, and related Board acknowledgement, 13 May 2026)

- **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 registrars[7] and following the reconvening of an Implementation Review Team (IRT) that had been suspended since 2018. According to a recently published Implementation Plan (8 January 2026). It is expected that the IRT prepares and publishes a Draft Consensus Policy and associated Disclosure Frameworks by the end of 2026. It is currently discussing possible accreditation models

  - 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:

[7] As recognized by the GAC in the Hamburg Communiqué (30 October 2023)

- *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.*
- 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.*[8]
- 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).

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

- 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 an Accreditation Models Paper (12 May 2025) and "threshold questions" and requests for guidance from the GNSO Council (30 July 2025).
- A dedicated GNSO Small Team was formed in August 2025 to assist in the formulation and eventual issuance of GNSO Council Responses and Guidance (13 November 2025) to the Implementation Review Team
- ICANN org resumed regular IRT meetings on 8 January 2026. On 23 January 2026, ICANN org, with input from the IRT, published an Implementation Plan and Work Breakdown to guide the development and deployment of a PPSAI Consensus Policy and the related Disclosure Frameworks. Over the 2026 calendar year, the IRT is expected to sequentially develop the four modules expected to compose the ultimate Accreditation framework: definitions of key terms (by May 2026), Consensus Policy language (by July 2026), data disclosure frameworks (by August 2026) and a human rights impact assessment (by October 2026). All these elements would be subject to a Public Comment proceeding by December 2026.
- In the GAC Seville Communiqué (15 June 2026) the GAC:
  - Urged the PPSAI IRT to work toward establishing an accreditation system that helps prevent misuse of privacy and proxy services, in which registration data records should reliably indicate whether a privacy or proxy service was used in a registration and provide information about the service used, so that parties with a legitimate interest know where they can direct inquiries, regardless of how many resellers or other intermediaries are involved in a registration.
  - Underscored the importance of the PPSAI Final Report recommendation which states that "*Registrars are not to knowingly accept registrations from privacy or proxy service providers who are not accredited through the process developed by ICANN.*"
  - Stressed that the privacy and proxy service accreditation system should provide a path to address cases of unaccredited operators offering their own privacy or proxy services, regardless of whether such unaccredited services are offered by affiliates of registrars, resellers, and other intermediaries within the registration chain.
  - Reiterated that the RDRS or its successor system should integrate support for disclosure requests related to data underlying privacy and proxy registrations.
- At the time of ICANN87 preparation, the reconvened PPSAI IRT continues to consider and discuss the proposed Draft ICANN Consensus Policy in implementation of the 2015 GNSO Policy Recommendations, aiming to create a framework to standardize business practices including regarding disclosure of underlying registration data when such services are involved in domain name registration.

- **GNSO work on Accuracy of Registration Data**, originally within a Scoping Team formed in October 2021 and subsequently paused for several years, **resumed** in a GNSO Small Team on Accuracy format (15 May 2025) which made recommendations to the GNSO Council (31 July 2025). **Recommendation 1 to examine the process for registrars to validate and verify registration data, is identified for possible future work** in the Final Issue Report on a PDP on DNS Abuse Mitigation (4 December 2025)
    - 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 required[9] 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*

[9] 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).

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) [...]."

- 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 data[10]. 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*

[10] 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)

#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 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)
- Recommendation 1 of the Small Team on Registration Data Accuracy was reflected in the Final Issue Report on a Policy Development Process on DNS Abuse Mitigation (4 December 2025) which discusses the "*Lack of Proactive/Timely Contact Verification*" as a potential policy gap to mitigate DNS Abuse and for which a potential solution identified is to "*examining the existing process for validating and verifying registration data under 2024 Registrar Accreditation Agreement*" (See p.14).

- In the GAC Dublin Commmuniqué (3 November 2025), the GAC:
  - Recommended that registrars be required validation and verification of registration data before a newly registered domain name can become accessible through the DNS,
  - Encouraged ICANN org undertake a holistic assessments of the evolution of technologies and registration practices that may affect the accuracy and reliability of domain registration data,
  - Called for the ICANN community to maintain an active forum in which to continue discussing possible next steps related to accuracy.
- In the GAC Mumbai Communiqué (16 March 2026), the GAC The GAC expresses "*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*" noting that as stated in the INFERMAL study (8 Nov. 2024) "*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*". The GAC thus proposed that "*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.*"
- Following the ICANN86 discussion of this matter between the GAC, Registrar and GNSO leadership (9 June 2026), the GAC stressed in its Seville Communiqué (15 June 2026) its eagerness "*to review the current rules, particularly ahead of the delegation of new gTLDs strings, taking into account all relevant aspects of this issue, including potential operational and financial challenges to registrars*." and that "*recognizing the substantial research already undertaken and the recommendations made*[11]*, [...] discussions should focus on identifying practical implementation pathways*". The GAC also highlighted the importance of "*early involvement of the ICANN Board in these discussions with the Contracted Parties and the GAC*"
- In response to the Seville Communiqué, the ICANN Board (10 July 2026) encouraged the GAC to "*further engage on the topic and where applicable, identify and consider additional data sources that help determine the scope of the issue*" and indicated it "*would welcome the GNSO's progress on its prioritized PDPs before initiating new work on DNS Abuse*".
- The Board also clarified in its more recent response (14 September 2026) to the GAC Chair's request to convene a Tri-lateral setting (11 May 2026), that: "*only two mechanisms exist to [create new obligations or modify existing ones]: contractual negotiations and gTLD policy development.*"

[11] The GAC referred to existing research and reports, such as the report of the GNSO Small Team on Accuracy and the INFERMAL report, the DNS Abuse Mitigation Final Issue Report and several SSAC Reports: SAC058, SAC115 and SAC129. More recently, the GAC also shared with the GNSO a more recent research paper (July 2026) which found that 89.45% of the malicious domains were active for less than two days.

- During a pre-ICANN87 call between GAC and Registrar Topic Leads (28 September 2026) registrar representatives:
  - Clarified that the RrSG does not currently have a formal position on changing the timeframe and is continuing to discuss the issue with its membership, including during ICANN87
  - Emphasized the potential impact on domain owners if a shortened timeframe leads to suspension before verification is completed, as it could affect active websites, businesses, or other services, and increased support costs can be significant relative to the revenue associated with an individual domain registration

.

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 on Registration Data 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 the context of the then 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**.
    - Since ICANN85 (March 2025), **the ICANN Board and GNSO Council took the necessary steps to launch the process** described in the ICANN Bylaws, Annex A, Sec. 9 **which provides for modification of GNSO Policy Recommendations** (Supplemental Recommendations). This process was discussed in the GNSO Council in January 2026 and an initial dialogue with members of the ICANN Board took place in the GNSO Council meeting on Thursday 12 February (see Agenda Item 5)
        - The ICANN Board resolved to not adopt the original SSAD Recommendations (12 March 2026)
        - The GNSO Council convened the SSAD Supplemental Recommendations Team (SRT) to propose modifications to the original 18 SSAD recommendations by February 2027.

- **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*"

- In the ICANN82 GAC Seattle Communiqué (17 March 2025), the GAC stated on this matter: *When reviewing the progress of implementation of its strategic plan, the GAC noted concerns related to one of its expected outcomes for 2024- 2025, "to track developments related to the collection and publication of registration information related to legal entities." In particular, the GAC is concerned by the lack of any progress regarding the implementation of EPDP Phase 2A recommendations, which the Board adopted in 2022. The GAC reiterates its position expressed in the ICANN77 Communiqué that "contracted parties should collect and make data of legal persons publicly available."*
- The ICANN Board subsequently commented on the GAC Seattle Communiqué (4 April 2025) that: "*EPDP Phase 2A recommendations are in the queue for implementation, which is subject to the completion of EPDP Phase 1 implementation work now underway.*"
- Following the conclusion of the work of the EPDP Phase IRT[12], and In its context of its review of progress on the Expected Outcomes of the GAC Annual Plan 2025/2026, the GAC leadership determined that work to enable the collection and publication of legal entities' registration data[13] had not progressed since the related EPDP Phase 2A Policy Recommendations were adopted by the ICANN Board in March 2022. The GAC Chair thus sought advancement of the related policy implementation in a correspondence to the ICANN Board (11 May 2026).
- In the ICANN Board Chair response (24 August 2026), it was clarified that in light of the ICANN org cross-functional resources needed, and ongoing planning, the initiation of implementation work, consisting in Contracted Parties best practices and coordination with the technical community, is expected to take place in FY2027 which for ICANN ends in June 2027.

[12] See *infra*, discussion of Urgent Requests for disclosure of Registration Data.

[13] See Expected Outcome 5.1.3 on p.10: "*The GAC will continue to track developments related to the collection and publication of registration information related to legal entities including expected work by ICANN and the technical community to develop any necessary standards needed to facilitate differentiation between legal and natural person registration data within EPDP and RDAP*"

- **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 CTT 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

- SSAD Supplemental Recommendations
    - Draft of modified SSAD recommendations (As of Oct. 2026)
    - GNSO Assignment and workspace of SSAD Supplemental Recommendations Team (May 2026)
    - ICANN Board resolution (12 March 2026) to not adopt the original SSAD Recommendations
- Registration Data Request Service (RDRS)
    - GAC Comments (15 December 2025) on the ICANN org RDRS Policy Alignment Analysis (30 October 2026)
    - Final RDRS Standing Committee Report (10 November 2025)
    - ICANN Board resolutions (30 October 2025) regarding the continuation of the 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
    - GNSO Council chair letter (29 April 2026) and related Board acknowledgement (13 May 2026) that the SSAD SRT is expected to address the EPDP Phase 1 Rec. 18 policy gap regarding the “authentication” part of timely response to Urgent Requests
    - Updated Registration Data Policy (12 May 2026)
    - GAC Comments (15 December 2025) on the Timeline for Urgent Request Public Comment Proceeding (22 October 2025)
    - 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).

- Privacy/Proxy Services Accreditation (PPSAI) Policy Implementation
    - Proposed Draft ICANN Consensus Policy (as of Oct. 2026)
    - Implementation Plan (8 January 2026)
- Policy development on gTLD Registration Data (EPDP Phase 1, 2, 2A)
    - ICANN Board Chair response (24 August 2026), clarifying that initiation of implementation work is expected to take place in FY2027
    - GAC Chair correspondence to the ICANN Board (11 May 2026) regarding the advancement of policy implementation on the collection and publication of legal entities domain name registration data.
    - ICANN org Review of Public Comment (28 Avril 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 Board response (14 September 2026) to the GAC Chair's request to convene a Tri-lateral setting (11 May 2026)
    - GAC Chair correspondence to the ICANN Board and GNSO Council (11 May 2026) seeking the convening of a trilateral dialogue to address domain registration data accuracy during ICANN86.
    - Final Issue Report on a Policy Development Process on DNS Abuse Mitigation (4 December 2025) which discusses the "*Lack of Proactive/Timely Contact Verification*" as a potential policy gap to mitigate DNS Abuse and for which a potential solution identified is the GNSO Council Accuracy Small Team recommendation to "*examining the existing process for validating and verifying registration data under 2024 Registrar Accreditation Agreement*" (See p.14)
    - Panel discussion on Accuracy during the ICANN84 GAC Plenary Session on Registration Data (28 October 2025) as reflected in the Minutes of the GAC ICANN84 Dublin Meeting (p. 7)
    - 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
  - ICANN86 Seville Communiqué (15 June 2026) Issues of Importance related to Urgent Requests and Requestor Authentication, RDRS/SSAD, Privacy and Proxy Services, and Accuracy of Registration Data; as well as:
    - ICANN Board Comments on the Issues of Importance (10 July 2026)
  - ICANN85 Mumbai Communiqué (16 March 2026) Issues of Importance related to Urgent Requests, RDRS/SSAD, Privacy and Proxy Services, and Accuracy of Registration Data (under the heading of DNS Abuse); as well as:
    - ICANN Board Comments on the Issues of Importance (20 April 2026)
  - ICANN84 Dublin Communiqué (3 November 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 (6 January 2026)
  - 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 Kigali 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.

Document Administration

Title	ICANN87 GAC Session Briefing - Registration Data Issues
Distribution	GAC Members (before meeting) and Public (after meeting)
Distribution Date	Version 1: 6 October 2026