GAC Opening Plenary Session

Session #1 - GAC Opening Plenary

Session Objective

The GAC Opening Plenary Session is the first formal opportunity for GAC participants to gather, introduce themselves and prepare for the ICANN Public Meeting week. During this session the GAC Chair also typically (1) provides a "state of the committee" review, (2) summarizes the GAC meeting agenda for the week and (3) identifies topic highlights and priority matters that merit GAC Member focus and attention.

Session Agenda

During this ICANN83 opening session, the GAC Chair will welcome in-person and remote attendees, highlight particular aspects of the meeting week agenda and share logistical information to help all attendees participate effectively during the meeting week. It is also traditional for a representative of the government of the country hosting the ICANN public meeting to offer brief welcoming remarks during the opening plenary session.

The Chair will also highlight a number of substantive and operational matters that the committee is currently addressing and identify a number of work efforts that will attract committee attention in the coming months.

In this hybrid meeting format the committee will also engage in the traditional "tour de table" ceremony during which all GAC delegates will be invited to introduce themselves. First, in-person delegates will identify themselves, followed by remote participants who raise their hands remotely to indicate their desire to speak. Delegates will be invited to share comments on their meeting goals and expectations.

Time permitting, GAC members will review the Communiqué drafting schedule and process for ICANN83. The drafting process has progressively evolved in the past several years and attendees will be familiarized with how some of those recent innovations will be encompassed for this public meeting.

Recent Developments

GAC Chair Reporting

Time permitting, the GAC Chair will likely report on recent discussions among ICANN Community leaders from other ICANN Supporting Organizations and Advisory Committees and recent communications among the Board-GAC Interaction Group (BGIG).

Since ICANN82, the GAC has provided written public comments to the ICANN community regarding the ICANN Public Meeting Strategy. Copies of those filed comments are archived on the GAC Public Comments activity page at this link - https://gac.icann.org/activity/gac-public-comment-opportunities.

Since ICANN82, the GAC has also received several pieces of written correspondence regarding the GAC's ICANN82 Communiqué and the status of past GAC advice. Correspondence documents related to those matters and others since ICANN82 are posted and tracked on a special web page of the GAC website which can be accessed here - https://gac.icann.org/advice/correspondence/.

Key Reference Documents

- GAC Public Comment Opportunities Web Page - https://gac.icann.org/activity/gac-public-comment-opportunities
- GAC Correspondence Web Page - https://gac.icann.org/advice/correspondence/

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Governmental Advisory Committee

GAC Capacity Development Session on the New gTLD Program Next Round - Applicant Guidebook

Session 2

Session Objective

As per each ICANN public meeting, the GAC devotes time on its schedule to capacity development matters. For ICANN83, the session will focus on the Applicant Guidebook for the New Generic Top-Level Domains Program Next Round.

Background

GAC capacity development sessions are built to provide an opportunity for GAC members to learn the basics or increase their knowledge on aspects of the ICANN multistakeholder model, its structure, and operations. It is also an opportunity for GAC attendees to become acquainted with different ICANN community groups in order to facilitate future dialogue, and to share experiences and best practices to enhance GAC internal collaboration on various ICANN matters.

Recently, capacity development sessions have been embedded in the GAC schedule for ICANN public meetings as a regular activity of the GAC, and are no longer scheduled to take place on the margins of ICANN meetings.

Current Status and Recent Developments

Capacity development activities play an important part in the work of GAC Under-Served Regions Working Group for the committee.

In light of the high engagement demonstrated by members, the USRWG and the GAC Leadership continue exploring new modalities to enhance capacity development initiatives intersessionally and during ICANN meetings.

For 2025 and until the next round application launch in April 2026, capacity development activities of the GAC will focus on topics related to the New gTLD Program Next Round. The objective is to raise the GAC's awareness on topics and processes to help GAC delegates prepare for the next round.

Initiated in Seattle, two capacity development sessions focused on the next round of new gTLDs, with the aim for GAC members to:

1. Understand what the geoTLD group does, considering the leading up to the Next Round
2. Empower GAC members to use the Next Round Champions Toolkit effectively

- **ICANN83 GAC Capacity Development Session (CDS)**

The ICANN83 capacity development session will focus on the Applicant Guidebook, how it will be used, the logistics and timing of next steps in preparation for the next round, and a walkthrough of how an Applicant will apply for a new gTLD, including the challenges that may be encountered.

Subsequently, the ICANN83 GAC plenary session on the next round of new gTLDs, will include an update on the Applicant Guidebook status and specifically on priority topics of interest to GAC members. GAC members will discuss materials in preparation for the next round of new gTLDs building on the GAC Capacity Development Session on new gTLDs, including GAC Early Warnings and GAC Advice, PICs/RVCs, GeoTLDs, and Contention Sets.

To best prepare for both sessions in Prague, GAC members are encouraged to join the ICANN webinar on the complete draft Applicant Guidebook (3 June), to familiarize themselves with some of the content of the Applicant Guidebook, on which the ICANN83 capacity development and plenary sessions will expand on.

Key Reference Documents

- ICANN82 GAC Capacity Development Sessions on New gTLD Program Next Round
- ICANN83 GAC briefing on New gTLD Program Next Round
- ICANN webinar to introduce the complete draft Applicant Guidebook (3 June 2025)
- GAC Under-Served Regions Working Group

Document Administration

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GAC Discussion on New gTLD Program Next Round

Session #3

Contents

Session Objective

GAC Members continue preparing for the next round of New gTLDs, building on the Capacity Development Session which precedes this meeting, and further discussing topics of interest to governments.

The session will focus on two briefings by GAC representatives and ICANN org to the GAC, the first one on the Applicant Guidebook (AGB) state of play, followed by a status update following the roll-out of the Applicant Support Program (ASP). GAC members will then discuss draft Applicant Guidebook language (AGB) and policy matters of interest to the committee. GAC members will also discuss GAC communiqué language on priority issues pertaining to new gTLDs.

Leadership Proposal for GAC Action

1. GAC Members to receive an update on the Applicant Guidebook (AGB) including an overview of the draft Applicant Guidebook language out for public comment.

2. GAC Members to receive a status update on the Applicant Support Program, current applications status, and next steps in preparation for the next round of new gTLDs.

3. GAC Members to receive an update on Outreach and Engagement Activities on the ASP and the Next Round of New gTLDs.

4. GAC Members to discuss topics of interest on New gTLDs including (but not limited to):
   a. GAC Early Warnings and GAC Advice;
   b. Public Interest Commitments/Registry Voluntary Commitments;
   c. Contention Sets;
   d. Replacement String;

Current Status and Recent Developments

Applicant Support Program and Registry Service Provider Evaluation Program

Since ICANN82, the [Applicant Support Program](#) (ASP) and the [Registry Service Provider (RSP) Evaluation Program](#) programs have continued their course, with the latter closing on 19 May 2025. (following a launch on 19 November 2024). Both of these programs play an important role in preparation for the opening of the new gTLD application window, which is planned for April 2026.

The Applicant Support Program is intended to make applying for a new gTLD and operating a registry more accessible to applicants that otherwise would be unable to do so due to financial and resource constraints. As of 19 May 2025, four applications have been submitted for the ASP, with 41 more in various stages of the application process. For qualified applicants, additional services will be available such as pro-bono service providers, as they prepare for the opening of the gTLD application window. ASP applications can be submitted until 19 November 2025. GAC members will receive an update on the status of the ASP and ASP applications during the GAC plenary session on new gTLDs at ICANN83. They will also receive an update on "outreach" efforts.

The ASP launched on 19 November 2024 and as of 19 May 2025 has:
- 21 applications **in draft** (applications that have been started but not yet submitted organization information);
- 19 **initiated** applications (applications that have submitted organization information);
- 4 **submitted** application (applications that have submitted application information for evaluation); and
- 1 application **withdrawn** by the applicant.

Statistics can be found on the [ASP Program Statistics](#) webpage which is updated monthly.

The ASP ICANN org team created [Applicant readiness materials](#), which were translated in the six ICANN languages, and published on the Next Round website. Materials include:
- the [ASP Application System User Guide](#),
- [ASP Applicant Checklist](#), and the
- [ASP Applicant Quick Start Guide](#).

The RSP Evaluation Program assesses RSPs on technical aspects of operating a gTLD. RSPs offer critical services – such as DNS, Registration Data Access Protocol, and DNS Security Extensions, among others – on behalf of a registry operator. Through the RSP Evaluation Program, RSPs need only be evaluated once, regardless of the number of gTLDs they intend to support. The first list of successful RSP applicants will be published in December 2025. There will be another opportunity for RSPs to be evaluated through the program when the new gTLD application window opens.

Applicant Guidebook

The next milestone on the path to open the new gTLD application window is the completion of the Applicant Guidebook (AGB), which was released for public comment in its entirety on 30 May 2025. The complete draft AGB language has been developed in collaboration with the Subsequent Procedures Implementation Review Team and has gone through Public Comment previously. Input on this final Public Comment is sought on the complete draft AGB in its entirety and should be focused on:

- A review for inconsistencies across sections of the complete draft AGB
- Any new issues or oversights that have not been discussed previously

Having heard the feedback that the AGB should be made more accessible, ICANN org also has begun developing several tools intended to aid potential applicants in understanding the journey they would embark on, should they decide to apply, as well as anyone interested in the different aspects of the gTLD program.

The AGB is the translation of the community-developed policy recommendations into specific program rules and the requirements that an applicant will need to meet. The ICANN Board is expected to adopt the final AGB by December 2025. GAC members are actively participating in the Implementation Review Team (IRT) responsible for reviewing and developing AGB language with ICANN org (see below section on the IRT), and the committee has been consistently providing input to AGB related public comment proceedings.

Due to the complex nature of the AGB, and the fact it is a complex legal document which may be difficult to understand among those who are less familiar with ICANN and the Domain Name System, ICANN org is actively developing materials to help the wider community digest the AGB. ICANN org recognizes the need for supplemental, complementary materials to aid prospective generic top-level domain (gTLD) applicants in understanding the application requirements, and how to navigate the application and evaluation processes. This content is in the works as follows:

- Key Topic Overviews
- Frequently Asked Questions (FAQs)
- Webinars and ICANN Meeting Sessions

Key Topic Overviews

These documents provide succinct overviews of various AGB topics, relevant policies, and procedures, using plain language where practicable. The topics available now include trademark protections, geographic names, Governmental Advisory Committee (GAC) early warnings and consensus advice, objections and appeals, and community input. More topics are in development. These overviews can be found on the New gTLD Program: Next Round website on the Applicant Guidebook Resources page. GAC members will be briefed on these documents at ICANN83.

Implementation Review Team (IRT)

The Subsequent Procedures **Implementation Review Team (IRT)** commenced its work in May 2023 and is expected to draft the next Applicant Guidebook in preparation for the next round of new gTLDs. **The GAC appointed Canada as a representative to participate in the process, and the United Kingdom as an alternate**, to provide input to the IRT and report back to the broader committee on areas of importance to the GAC.

At the time of this briefing, ICANN org opened the fifth and final in a series of Public Comment proceedings that will seek input from the ICANN community on the complete draft language for the Applicant Guidebook (AGB) for the New gTLD Program: Next Round. Specifically, ICANN org is looking for input from the community on items that have not been addressed as part of previous Public Comment proceedings.

Specifically, ICANN org is looking for input from the community on whether the proposed language is consistent with the relevant outputs from the Final Report on the New gTLD Subsequent Procedures Policy Development Process. It should be noted that the proposed language has been developed in collaboration with the Subsequent Procedures Implementation Review Team.

More information from the IRT, as well as meeting recordings, and other material is available here.

Next Round Website

The website for the New gTLD Program was launched following ICANN79, and it is expected to be a central source of information for the ICANN community as well as current and future new gTLD applicants. The website includes information about the program, tools and resources for applicants, updates on program status, and information regarding a specific round (e.g. 2012 versus the upcoming round). GAC members are encouraged to familiarize themselves with the website to ensure they are up to date with materials and information related to the program which will be regularly posted here.

Background

On 16 March 2023, the Board resolved to instruct ICANN org to begin the implementation of all Final Report Outputs detailed in Section A of the "Scorecard on Subsequent Procedures PDP" (March Scorecard) and to make available resources required for the successful and timely opening of the next round of new gTLDs. The ICANN Board approved ninety-eight (98) recommendations contained in the Final Report on the New gTLD Subsequent Procedures Policy Development Process, and marked the remaining thirty-eight (38) recommendations as "pending".

The Board further directed ICANN org to deliver a comprehensive implementation plan to the Board no later than 1 August 2023, containing a work plan, relevant information for the Infrastructure Development stream, timelines and anticipated resource requirements to announce the opening of the next round of new gTLDs. ICANN org delivered the implementation plan for opening the next round of applications for new generic top-level domains (gTLDs), and on its resolution approved on 27 July 2023, the Board acknowledged receipt of the plan and directed

ICANN org to provide the Board with periodic updates on its progress on program implementation, as well as to continue to prepare information for the Board Finance Committee on periodic requests for implementation funding as implementation work progresses through identified milestones. A [status update](#) on the New gTLD Program: Next Round was published by ICANN org on 24 February 2025.

The Board engaged with the GNSO Council on items marked as "pending", and following this interaction the GNSO Council transmitted to the Board the [New gTLD Subsequent Procedures Pending Recommendations - GNSO Council Clarifying Statement](#) (Clarifying Statement) on 5 September 2023, developed by the GNSO Council SubPro Small Team to address the Board's concerns on the pending Outputs. The GNSO Council noted the Clarifying Statement should be read as complementary to recommendations as stated in the Final Report and should be considered jointly with the Outputs for the purpose of implementation and operation of the New gTLD Program Next Round.

In September 2023, the ICANN Board published several documents of interest to the GAC pertaining to new gTLDs. Relevant sections of these documents are summarized below for GAC membership ease of reference.

- On 10 September 2023, the ICANN Board published the [September 2023 Scorecard: Subsequent Procedures PDP](#), i.e. an updated Board Scorecard on the SubPro PDP WG recommendations marked as "pending" in the Board Resolution on 16 March 2023.
- The Board also published on 10 September 2023 the [Board Scorecard on ICANN77 GAC Advice](#), outlining Board decisions following the issuance of GAC advice at ICANN77.
- On 21 September 2023, the Board published the [Board Scorecard on ICANN77 GAC Issues of Importance](#), outlining its comments and decisions on the GAC ICANN77 Issues of Importance following the Board-GAC Interaction on this topic.

The Board published on 26 October 2023 the [October 2023 Board Scorecard: Subsequent Procedures (SubPro PDP)](#), outlining Board decisions on pending recommendations from the SubPro PDP WG Final Report.

On 11 June 2024 the ICANN Board published the [June 2024 Scorecard: Subsequent Procedures Supplemental Recommendations](#). This June 2024 Scorecard: Subsequent Procedures Supplemental Recommendations (Supplemental Recommendations Scorecard) is intended to facilitate the Board's consideration of the [GNSO Council-approved Supplemental Recommendations](#).

Key Reference Documents
- [ICANN Materials Provide Prospective New gTLD Applicants Clarity on Key Topics](#) (21 May 2025)
- Applicant Guidebook Resources - [Key Topic Overviews](#)
- [Board Reply to GAC Response to Board Update following Board-GAC Bylaws Consultation on ICANN80 GAC Advice](#) (29 January 2025)

- [GAC Response to Proposed Update to Recommendation 7 from the New gTLD Auction Proceeds Cross-Community Working Group](#) (20 January 2025)

- [GAC Response on the Board's Proposed Path Forward on Auctions: Mechanisms of Last Resort/Private Resolution of Contention Sets in New gTLDs](#) (13 December 2024)

- [GAC ICANN80 Advice Follow-up on Outreach and Engagement Report](#) (11 December 2024)

- [ICANN81 Istanbul Communiqué](#) (18 November 2024)

- Board follow-up on Board-GAC Bylaws Mandated Consultation Processes on GAC Advice:

    - [Follow-up](#) on 3 September 2024 Board-GAC Consultation regarding ICANN77 GAC Advice Item 4.a.i (Auctions) (3 October 2024)

    - [Update](#) following Board-GAC Bylaws Consultation on ICANN80 GAC Advice on the New gTLD Applicant Support Program (ASP) (3 October 2024)

- [Board Action on ICANN80 GAC Advice](#) (29 July 2024)

- [ICANN Board Proposed Path Forward for the GAC Consensus Advice in the ICANN80 Kigali GAC Communique](#) (23 July 2024)

- [Board Scorecard on ICANN78 GAC Issues of Importance (9 May 2024)](#)

- [Board Action on ICANN79 GAC Advice (5 May 2024)](#)

- [Draft New gTLD Program: Next Round Applicant Support Handbook](#) (12 February 2024)

- [Board Action on ICANN78 GAC Advice](#) (21 January 2024)

- [Overview of Analyses of Costs and Benefits of a Next Round of the New gTLD Program](#) (22 January 2024)

- [GNSO Guidance Process (GGP) for Applicant Support Guidance Recommendation Final Report](#) (8 December 2023)

- [Implementation Framework for Content-Related Registry Commitments in the New gTLD Program: Next Round](#) (5 December 2023)

- [ICANN78 GAC Hamburg Communiqué](#) (30 October 2023)

- [October 2023 Board Scorecard: Subsequent Procedures (SubPro PDP)](#) (26 October 2023)

- [September 2023 Board Scorecard: Subsequent Procedures](#) - 10 September 2023

- [Board Scorecard on ICANN77 GAC Advice](#) (10 September 2023)

- [Board Scorecard on ICANN77 GAC Issues of Importance](#) (21 September 2023)

- [Scorecard: Subsequent Procedures (SubPro PDP)](#) - 16 March 2023

- [ICANN77 GAC Communiqué](#) - 20 June 2023

- [New gTLD Subsequent Procedures Operational Design Assessment](#) - 12 December 2022

- [GAC Consensus Collective Comment](#) (1 June 2021) on GNSO New gTLD Subsequent Procedures Final Outputs for ICANN Board Consideration.

- [Final Report on the new gTLD Subsequent Procedures PDP WG](#) - 1 February 2021

Further Information

- GAC Policy Background Document on Subsequent Rounds of New gTLDs: https://gac.icann.org/briefing-materials/public/gac-policy-background-new-gtlds-subsequent-rounds.pdf

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DNS Abuse Mitigation

Session 4

Contents

Session Objectives

DNS Abuse is a priority issue for the GAC. Continuing on a program proposed since ICANN81 by the GAC co-leads for DNS Abuse (European Commission, Japan, and the United States), covering the 2024 global amendments to ICANN's Registry Agreement and Registrar Accreditation Agreement, which created obligations for domain name registries and registrars to mitigate or otherwise disrupt DNS Abuse, and taking into account recent proposals for "micro" policy development processes and compliance updates, during ICANN83 the GAC will discuss:

- The timeline and next steps for GNSO work on DNS Abuse in the reconvened GNSO Small Team on DNS Abuse
- Potential topics for targeted policy development or future contractual negotiations between ICANN and Contracted Parties.

Leadership Proposal for GAC Action

1. **Understand procedural avenues for the GAC to pursue additional DNS Abuse policy before any delegation of New gTLDs**

   ○ **GAC Advice to the ICANN Board**: Per ICANN Bylaws section 12.2(a)(ix), the GAC "*may put issues to the Board directly, either by way of comment or prior advice, or by way of specifically recommending action or new policy development or revision to existing policies*"

   ○ **GAC Request for an Issue Report:** Per Annex A, Section 3 of the ICANN Bylaws, as an Advisory Committee of ICANN, the GAC "*may raise an issue for policy development by action of such committee to request an Issue Report, and transmission of that request to the Staff Manager and GNSO Council*". Once such a Final Issue Report is produced, the GNSO Council would vote for or against the initiation of a Policy Development Process.

   ○ **Fact Finding to assess the effectiveness** of previous advice, recommendations and initiatives:

      – As was previously done in the Hyderabad Communiqué (8 November 2016) and the Copenhagen Communiqué (15 March 2017), leading to ICANN org's Draft Responses (30 May 2017) regarding DNS Abuse mitigation efforts related to the implementation of 2013 RAA provisions and Registrars Accreditation, the implementation of New gTLD Applicant Guidebook and the Registry Agreement, and ICANN's investigation, reporting and mitigation activities.

      – Which in the future could concern compliance enforcement and auditing of DNS Abuse-related obligation such as the Registry Agreement Specification 11 and the new DNS Abuse amendments[1]; the implementation of voluntary frameworks (listed below); and the effectiveness of associated ICANN Advisory guidance such as the Advisory, New gTLD Registry Agreement Specification 11 (3)(b) (8 June 2017) and the recent Advisory: Compliance With DNS Abuse Obligations in the Registrar Accreditation Agreement and the Registry Agreement (2 May 2024)

   ○ **Contribution to the development of new voluntary frameworks** such as was previously done with:

      – The Framework for Registry Operators to Respond to Security Threats (20 October 2017) which was developed in response to Board direction regarding part of the GAC Beijing Safeguards on Security Checks, over a period of 2 years among representatives from registries, registrars, the GAC PSWG and ICANN org.

      – The Framework on Domain Generating Algorithms (DGAs) Associated with Malware and Botnets jointly drafted by the RySG and GAC PSWG to address the role of both registries and law enforcement in handling malware and botnet

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[1] ICANN Contractual Compliance provided an update on the first year of enforcing the DNS Abuse mitigation obligations (23 April 2025)

infrastructure using the Domain Name System, specifically as a result of illegitimately used DGAs

- – The industry-led [Framework to Address Abuse](#) (October 2019)
- ○ **Contribution of policy and procedural perspectives in ICANN community discussions:**
  - – **GAC Public Comments** on various ICANN processes, such as the GAC Comments on [the DNS Abuse Amendments](#) (17 July 2023), on [the SSR2 Review Draft Report](#) (3 April 2020) and [Final Report](#) (8 April 2021), and on the CCT Review [Final Report](#) (11 December 2018)
  - – **GAC Correspondence to the ICANN Board** such as, for example, in the area of registration data, the recent GAC correspondence to the [ICANN Board on Urgent Requests](#) (15 October 2024) which proposed a way forward to resolve a long-standing issue.
  - – **Formal GAC Statements** such as the previous [GAC Statement on DNS Abuse](#) (18 September 2019) which was issued in the context of expected community discussions and following an [Open Letter by the Registry Stakeholder Group](#) (19 August 2019)
  - – **Direct involvement in policy development processes** at various stages such as in Scoping Teams and PDP Working Groups

2. **Continue considering the scope of desirable policy development and contract amendments to further improve DNS Abuse prevention and mitigation, prior to the delegation of future new gTLDs,** in light of:

   - ○ Recommendation by the [GNSO Small Team on DNS Abuse](#) (7 October 2022) **to initiate a policy development process on malicious registrations**, and potential contractual negotiations on this matter, to be informed by findings of the Inferential Analysis of Maliciously Registered Domains (INFERMAL) project which explored the drivers of malicious domain name registrations[2].

   - ○ The GAC's statement in the [GAC Comments](#) (17 July 2023) on the proposed Amendments that "*subsequent work with the multistakeholder community on DNS Abuse [...] should include Policy Development Processes (PDPs) to further inform the updated RA and RAA, as well as other work on outstanding issues to address prior to the next application round for New gTLDs.*" *and* the [summary report of Public Comments on the new amendments](#) (1 August 2023) in which ICANN org noted "*the ICANN community will have the opportunity to discuss these obligations and determine if further obligations are required [...]. **ICANN org and the CPH NT support the comments from the GAC which stated that after the proposed amendments are adopted, work should include Policy Development Processes (PDPs) to further inform the updated Base RA and RAA.***"

   - ○ **The ICANN Board's indication**, during a GAC/Board interaction on the ICANN79 San Juan

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[2] See ICANN OCTO Blog "[New ICANN Project Explores the Drivers of Malicious Domain Name Registrations](#)" on 25 April 2023

Communqué (13 May 2024)[3] that while Compliance reports are expected to contribute to measuring the impact of the DNS Abuse Amendments, **it would be up to a community-led effort, facilitated and supported by ICANN, to determine the specific metrics and data sets that will allow measurement** of such an impact. In [response to Issues of Importance in the ICANN80 Kigali Communiqué](link) (15 October 2024), the ICANN Board further stated that "*It is important to allow sufficient time for the implementation of the new amendments and to accurately measure impact. For example, **Compliance metrics, while an important data source, alone cannot be relied on to measure the overall impact of the DNS Abuse Amendments**. Compliance has visibility over the instances of DNS Abuse that are subject of Compliance's cases, but not over the entire DNS market and how contracted parties or other actors within the DNS ecosystem address DNS Abuse*".

○ **The NetBeacon Proposals for PDPs on DNS Abuse**, published in the form of a recent [White Paper](link) (21 May 2025) which offers 5 topics for "*tightly scoped PDPs*" that are "*designed to address a discrete problem without creating undue complexity or overreach*":

– **Associated Domain Check**: A reactive approach requiring registrars to investigate domains linked to malicious actors, particularly in cases of bulk domain registrations used for abuse campaigns.

– **Friction in Bulk Registrations for New Customers**: A proactive approach that seeks to introduce friction for new customer accounts, prior to gaining access to high volume registration tools (i.e., API access for new customers), until trust is established.

– **Subdomain DNS Abuse**: A proposal to help address the growing abuse of subdomain services by codifying the responsibilities of registrants who offer them, via requirements in registrar and registry terms of service.

– **Registrant Recourse Mechanisms**: A measure that ensures registrants have a path to challenge enforcement actions of registrars or registries when taken in error.

– **Centralized Coordination on DGA Malware and Botnets**: A proposal to have ICANN serve as a coordination hub for law enforcement and national CERTs in cases involving DGA-based malware and botnets, enabling more efficient, synchronized mitigation.

○ **Potential GAC Proposals as topic for targeted Policy Development**, including:

– **Bulk Registrations**, following the findings in the [Final Report](link) (8 November 2024) of the Inferential Analysis of Maliciously Registered Domains (INFERMAL) as highlighted in the [GAC Istanbul Communiqué](link) (18 November 2024), presented to the ICANN Community in a [Pre-ICANN82 webinar](link) (19 February 2025) and discussed by the GAC during ICANN82 in GAC plenary as well as in its bilateral meeting with the SSAC (see [GAC ICANN82 Meeting Minutes](link))

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[3] See [ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué](link) (9 May 2024)

- **Preventative measures**, including risk-based approaches, registration behaviors monitoring, and verifications at time of registration before delegation
- **Transparency obligations for Contracted Parties** in order to provide for public reporting on their actions taken to mitigate and disrupt DNS Abuse, that may otherwise not be visible.

Current Status and Recent Developments

- **Amendments of the Registry and Registrar Agreements to Enhance DNS Abuse Mitigation Obligations**

  - In the ICANN76 Cancún Communiqué (20 March 2023), the GAC encouraged the ongoing negotiations *"to proceed expeditiously"* and noted that it *"considers that **continued efforts in this area will be required, including further improvement of contractual obligations and/or targeted policy development processes prior to the launch of a second round of New generic Top-Level Domains** (new gTLDs)."* In addition, the GAC encouraged *"Contracted Parties and ICANN to further consider, inter alia, proactive measures as well as positive incentives for registries and registrars in future work on DNS abuse mitigation or disruption."*

  - In preparation for ICANN77, the **GAC Underserved Regions Working Group** (USRWG) organized two **webinars** to prepare newcomers and underserved regions GAC representatives to contribute to a Comment on the expected amendments of the Registry and Registrar contracts[4].

  - **ICANN org initiated a public comment proceeding** on the Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations (29 May 2023) which were subsequently presented in a ICANN77 Prep Week webinar (30 May 2023). Among the various changes proposed to ICANN's contracts, the amendments include a **new requirement to promptly take appropriate mitigation actions against domains for which the contracted party has actionable evidence** demonstrating that the domains are being used for DNS Abuse. In addition to the proposed contract amendments, a draft ICANN Advisory provides detailed explanation of the new provisions and sets expectations as to their interpretation.

  - Following its discussions of the proposed amendments during ICANN77[5], GAC Comments (17 July 2023) were submitted in the public comment proceeding:

    - The GAC noted that the amendments are *"timely and relevant and, when adopted, will represent an important first step forward to combat DNS Abuse."*

    - The GAC stressed *"In light of the ongoing threat that DNS Abuse poses to consumers and the public and private sectors"*, that *"it is imperative that the improved contracts are swiftly adopted following the completion of the Public Comment process"*

    - **The GAC expressed support for "*the proposed amendments as a general matter*"** but invited *"ICANN org and the CPH NT to consider some specific issues related to the text of the amendments"*. These include: the DNS Abuse definition; reporting and monitoring by Contracted Parties; consequence for non compliance; providing the ICANN community the ability to monitor how compliance is enforced; the need for the Advisory to be updated from time to time; and the need to address DNS Abuse both inside and outside of ICANN.

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[4] See Pre-ICANN77 GAC Capacity Development Webinar on DNS abuse #1 (4 May 2023) and Webinar #2 (22 May 2023)
[5] See ICANN77 GAC Capacity Development Workshop on DNS Abuse (Sunday 11 June) and GAC Discussion on DNS Abuse (Wednesday 14 June)

- **The GAC indicated looking forward to "*engaging in subsequent work* with the *multistakeholder community on DNS Abuse after the amendments are adopted. This work should include Policy Development Processes (PDPs) to further inform the updated RA and RAA, as well as other work on outstanding issues* to address prior to the next application round for New gTLDs."**

  ○ In its [Public Comment Summary Report](#) (1 August 2023), **ICANN org indicated that voting by registries and registrars will proceed on the amendments as initially proposed** and noted *"[r]regarding comments that the proposed amendments are insufficient to address the challenge of DNS Abuse": ICANN org acknowledges the comments and reminds the community that the ICANN community will have the opportunity to discuss these obligations and determine if further obligations are required [...]. **ICANN org and the CPH [Negotiating Team] support the comments from the GAC which stated that after the proposed amendments are adopted, work should include Policy Development Processes (PDPs) to further inform the updated Base RA and RAA.***"

  ○ [Voting by registries and registrars](#) on the amendments started on 9 October 2023 for a duration of 60 days and concluded successfully with 80% of affirmative votes by Registries and 94% approval by Registrars[6] .

  ○ The ICANN Board subsequently [resolved to approve the amendments](#) (21 January 2024) and determined that "***no further revisions to the proposed Global Amendments are necessary after taking the public comments** and voting results into account"*.

  ○ The [Amendment of the Registry Agreement](#), the [Amendment of the Registrar Accreditation Agreement](#) and the related [Advisory: Compliance With DNS Abuse Obligations in the Registrar Accreditation Agreement and the Registry Agreement](#) were published on 5 February 2024 and became effective on 5 April 2024[7].

  ○ In the [ICANN79 GAC San Juan Communiqué](#) (11 March 2024), the GAC stated that it *"will track reports from ICANN Compliance on DNS Abuse enforcement"* and that *"there remains a general expectation that significant progress occur in advance of the next round of new gTLD applications"*.

  ○ In its [ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué](#) (9 May 2024) regarding the ICANN79 Communiqué, the ICANN Board stated: "***the intent is that Compliance's reports contribute to measuring the impact of the DNS Abuse Amendments**. However, **determining the specific metrics and data sets that will allow measurement of such an impact should be a community-led effort, facilitated and supported by ICANN**"*. It further indicated that *"an ICANN org cross-functional team working on analyzing the information and determining how to approach these efforts.*"

  ○ During the GAC and [ICANN Board discussion](#) (21 October 2024) of the Issues of Importance identified in the [ICANN80 Kigali Communiqué](#) (17 June 2024), the ICANN Board stressed that the new amendments *"empower ICANN Contractual Compliance*

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[6] Detailed voting results available at https://www.icann.org/resources/pages/global-amendment-2024-en
[7] See notices sent by ICANN org to [Registry Operators](#) and [Registrars](#) (5 Feb. 2024)

(Compliance) to take enforcement actions against registrars or registries who fail to adequately mitigate or disrupt well evidenced DNS abuse"

- ○ As it relates to measuring the **impact and effectiveness of the new DNS Abuse amendments**, the ICANN Board stated "*It is important to allow sufficient time for the implementation of the new amendments and to accurately measure impact. For example, **Compliance metrics, while an important data source, alone cannot be relied on to measure the overall impact of the DNS Abuse Amendments**. Compliance has visibility over the instances of DNS Abuse that are subject of Compliance's cases, but not over the entire DNS market and how contracted parties or other actors within the DNS ecosystem address DNS Abuse. Accordingly, **Compliance data can be considered alongside that of other third-party experts who also capture nuanced metrics**. For instance [Net Beacon's MAP](#) contains metrics across the global gTLD domain name market such as normalized abuse rates, median time to mitigate, and viewpoint of malicious versus compromised names.*"

- ○ ICANN Contractual Compliance provided an [update on the first year of enforcing the DNS Abuse mitigation obligations](#) (23 April 2025)

- ● **Prospects of policy development regarding the prevention and mitigation of DNS Abuse**

  - ○ Per the [ICANN69 GAC Communiqué](#) (23 October 2020), "***From the GAC's perspective, the momentum has been increasingly building for concrete action** as the Community has progressively engaged in constructive dialogue to advance work on a shared goal, the mitigation of DNS abuse. Beginning with the recommendations from the CCT-RT and the SSR2 RT and continuing through several cross-community sessions and more recent work on a DNS Abuse Framework, **the GAC believes there is now a solid expression of broad support for concrete steps to be taken to address the core components of effective DNS abuse mitigation***".

  - ○ On 31 January 2022 the GNSO Council [formed](#) a **GNSO Small Team on DNS Abuse** expected to determine "*what policy efforts, if any, the GNSO Council should consider undertaking to support the efforts already underway in the different parts of the community to tackle DNS abuse*".

  - ○ In [The Hague Communiqué](#) (20 June 2022), the GAC stated that "***any PDP on DNS Abuse should be narrowly tailored to produce a timely and workable outcome***" to which the ICANN Board responded that it shares this view and is prepared to support the ICANN community in such pursuits[8].

  - ○ **The GNSO Small Team recommended** in a [Report to the GNSO Council](#) (7 October 2022): **the initiation of a tightly scoped policy development on malicious registrations** (Rec. 1), **further exploration of the role of bulk registrations play in DNS Abuse** and measures already in place to address it (Rec. 2), **encouraging further work towards easier, better and actionable reporting** of DNS Abuse (Rec. 3), and possible work between Contracted

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[8] See https://gac.icann.org/sessions/boardgac-interaction-group-bgig-call-31-august-2022 (31 August 2022) [*prior GAC website login required*]

Parties and ICANN Compliance regarding its findings on potential gaps in interpretation and/or enforcement of the current ICANN contracts (Rec. 4). The GNSO Council proceeded with recommended outreach to Contracted Parties regarding Rec. 3 and to Contracted Parties, the DNS Abuse Institute and ICANN Compliance regarding Recommendation 2 (6 January 2023).

○ **Regarding bulk registrations**, the ICANN Compliance response to the GNSO Council (22 February 2023) states that '*ICANN agreements and policies do not contain requirements or limitations related to registering domain names in bulk. As a result, **ICANN Contractual Compliance does not collect or track information on bulk registrations**, [or] the potential role these may play in Domain Name System (DNS) abuse".*

○ Based on further input received from Contracted Parties[9], **the GNSO Small Team on DNS Abuse concluded**, as part of its Preliminary Findings Preliminary Finding on Bulk Registrations (15 May 2023), that **the topic of bulk registrations "*does not fall within the realm of Consensus Policy at the moment*"** to the extent that:

– *Complaints from single or multiple registrations are handled uniformly, without clarity on what might constitute bulk registrations warranting targeted reactions.*

– *The lack of a clear definition did not elicit a clear response.*

– *Other Know Your Customer tools are deemed more efficient in detecting potential abuse, and should warrant more attention.*

– *ICANN's recently started Inferential Analysis of Maliciously Registered Domains (INFERMAL) project seems to indicate a willingness from the org. to look into this matter and provide [...] better statistics and intelligence* [on this matter]

○ On 15 May 2025, the GNSO Small Team on DNS Abuse **was reconvened following the GNSO Council revisiting the topic of DNS as a potential area for future policy work** in light of contract amendments between ICANN and contracted parties now in effect and related data from ICANN Compliance being available. The Assignment (29 April 2025) of the reconvened GNSO Small Team includes:

– Evaluating DNS Abuse mitigation efforts across ICANN including potential outreach to the broader ICANN community to seek input on suitable areas for policy development

– Assessing the impact of the Contract amendments on DNS abuse mitigation efforts;

– Discussing with relevant stakeholders and providing a summary on the insights from the INFERMAL study and how these insights can help inform next steps on DNS Abuse;

– Recommending the GNSO Council potential next steps (policy, further research, community/industry collaboration etc.) that may be needed to address DNS Abuse.

○ The INFERMAL project's Final Report (8 November 2024) was highlighted in the GAC Istanbul Communiqué (18 November 2024), presented to the ICANN Community in a Pre-ICANN82 webinar (19 February 2025) and discussed between the GAC, ALAC, SSAC, GNSO and in GAC plenary during ICANN82 (see ICANN82 GAC Meeting Minutes).

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9 See correspondence from the Contracted Parties House (CPH), Registry Stakeholder Group (RySG) and Registrar Stakeholder Group (RrSG)

- **Specific Reviews recommendations related to DNS Abuse[10]**

  - **The SSR2 Review delivered 63 recommendations** in its [Final Report](#) (25 January 2021) with a significant focus on measures to prevent and mitigate DNS Abuse.

    – The GAC considered a [Draft SSR2 Review Report](#) (24 January 2020) and endorsed many of the draft recommendations in a [GAC Comment](#) (3 April 2020). These were followed by [GAC Comments](#) (8 April 2021) on the final recommendations, and subsequent GAC Advice in the [ICANN72 Communiqué](#) (1 Nov. 2021) requesting follow-up action and further information on levels of implementation of certain recommendations, to which the ICANN Board [responded](#) (16 Jan. 2022), leading to further discussions during ICANN73[11], and communications by ICANN org to the GAC in a [letter](#) (18 March 2022) and a [follow-up email](#) (12 April 2022).

    – Based on the [ICANN Specific Review Quarterly Report](#) (31 March 2024), and based on several ICANN Board resolutions ([22 July 2021](#), [1 May 2022](#), [16 November 2022](#) and [10 September 2023](#)): **23 recommendations** are now **approved** (including 14 subject to prioritization for implementation), **38 rejected**, and **1 pending** further information.

    – On [10 September 2023](#), the **ICANN Board rejected 6 of the 7 Pending Recommendations relating to DNS Abuse** based on [assessment by ICANN org](#) - **12.1** (*DNS Abuse Analysis advisory team*), **12.2** (*structure agreements with data providers to allow further sharing of the data*), **12.3** (*publish reports that identify registries and registrars whose domains most contribute to abuse*), **12.4** (*report actions taken by registries and registrars to respond to complaints of illegal and/or malicious conduct*), **13.1** (*central DNS abuse complaint portal mandatory for all gTLDs*), **13.2** (*publish complaints data for third party analysis*) and **14.2** (*provide contracted parties with lists of domains in their portfolios identified as abusive*)

    – **In its discussion of contract negotiations on DNS Abuse, the GAC PSWG discussed[12] several SSR2 recommendations that have been rejected** by the ICANN Board per the [Board Scorecard](#) (22 July 2021) - **8.1** (*commission a negotiating team that includes abuse and security experts to renegotiate contracted party contracts*), **9.4** (*regular compliance reports enumerating missing tools*), **14.4** (*provide contracted parties 30 days to reduce the fraction of abusive domains below the threshold*) and **14.5** (*consider offering financial incentives*) - **for which the GAC acknowledged** in the [GAC ICANN72 Communiqué](#) (1 November 2021) "*the procedural bases for the Board's rejection*" **noting**, nevertheless, **"*the useful substantive aspects of certain rejected recommendations, including those that aim to provide ICANN org and ICANN Contractual Compliance with appropriate tools to prevent and mitigate DNS abuse*"**.

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[10] The status of all recommendations may be consulted in the ICANN's Quarterly Reports, the home page of each review, all accessible from https://www.icann.org/resources/reviews/specific-reviews
[11] See [ICANN73 GAC Minutes](#) p.13
[12] See [PSWG Conference Call](#) on 14 February 2023 [*prior GAC website login required*]

○ The **Competition, Consumer Trust & Consumer Choice Review Team's** [Final Report](#) (8 Sep. 2018) provided 35 recommendations. In the [Montréal Communiqué](#) (6 Nov. 2019), as clarified in subsequent [correspondence with the ICANN Board](#) (Jan. 2020), **the GAC advised the ICANN Board "*not to proceed with a new round of gTLDs until after the complete implementation* of the recommendations [...] that were identified as 'prerequisites' [14 recommendations] or as 'high priority' [10 recommendations]."** Following discussions related to the ICANN70 and ICANN71 Communiqués[13], the GAC and ICANN Board agreed on an understanding stated in a [GAC/Board BGIG Call](#) (5 October 2021) *[GAC Website Login required]* as "*the GAC would consider follow-up on the substance of the CCT Review recommendations and not the specific recommendations themselves.*" Several of the these recommendations were relevant to contract negotiations on DNS Abuse and were discussed by the GAC PSWG[14]:

- **Recommendation 17** (*collect data about and publicize the chain of parties responsible for domain name registrations)* **was approved and implementation is complete** per its [Implementation documentation](#) as of 14 Sep. 2022.

- **Recommendation 13** (*collect data on impact of registration restrictions* which the GAC noted "*would allow for more informed decision and policy making with regard to future standard registry and registrar contract provisions")* and **Recommendation 20** (*assess mechanisms to report and handle complaints and possibly consider amending future standard Registry Agreements to require registries to more prominently disclose their abuse points of contact and provide more granular information to ICANN)* were approved in part per [Board Scorecard of 22 October 2020](#), and **their implementation is in progress with competition estimated between Q3 2023 and Q2 2024** according to the [ICANN Specific Reviews Q1 2023 Quarterly Report](#) (31 March 2023)

- **Recommendation 14** *(incentives to adopt proactive anti-DNS Abuse measures)* and **Recommendation 15** *(negotiate amendments to include provisions aimed at preventing systemic use of specific registrars or registries for DNS Security Abuse, and establish thresholds of abuse for automatic compliance triggers)* **were rejected by the ICANN Board** ([resolution](#) of 10 September 2023)

○ The **RDS-WHOIS2 Review recommendations LE.1 and LE.2** which sought "*regular data gathering through surveys and studies to inform a future assessment of the effectiveness of RDS (WHOIS) in meeting the needs of law enforcement*" and "*conducting comparable surveys and/or studies with other RDS (WHOIS) users working with law enforcement on a regular basis*" are now **considered to be "*implemented to the extent possible*"** in connection with work of EPDP Phase 2 and 2A as well as the SSAD ODP, per the [Implementation Documentation](#) (11 October 2022)

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[13] See Communiqué clarification discussions and eventual Board responses to the GAC's Follow-up on Previous Advice in the ICANN70 Communiqué and ICANN71 Communiqué: ICANN70 [Clarification call](#) (21 April 2021) and [Board response](#) (12 May 2021), and ICANN71 [Clarification call](#) (29 July 2021) and [Board response](#) (12 September 2021).

[14] See [PSWG Conference Call](#) on 14 February 2023 *[GAC website login required]*

Key Reference Documents

- [NetBeacon White Paper: Proposal for PDPs on DNS Abuse](#) (21 May 2025)

- [ICANN Contractual Compliance update on the first year of enforcing the DNS Abuse mitigation obligations](#) (23 April 2025)

- [ICANN Board Comments on Issues of Importance in the ICANN82 Seattle Communiqué](#) (4 April 2025)

- [ICANN Board Comments on Issues of Importance in the ICANN81 Istanbul Communiqué](#) (29 January 2025)

- INFERMAL project's [Final Report](#) (8 November 2024)

- SSAC [SAC115 Report](#) (19 March 2021), a proposal for an Interoperable Approach to Addressing Abuse Handling in the DNS and a the recent [Pre-ICANN81 GAC Webinar on DNS Abuse mitigation (4 October 2024)](#) which provided status on the implementation of the SSAC recommendations.

- [ICANN Contractual Compliance New DNS Abuse Monthly Reports](#) (since April 2024)

- [ICANN Board Comments on Issues of Importance in the ICANN80 Kigali Communiqué](#) (15 October 2024)

- [ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué](#) (9 May 2024)

- [Contracted Parties Summit](#) (6-9 May 2024) and [recordings of the open sessions](#).

- [Amendment of the Registry Agreement](#), [Amendment of the Registrar Accreditation Agreement](#) and related [Advisory: Compliance With DNS Abuse Obligations in the Registrar Accreditation Agreement and the Registry Agreement](#) (published on 5 February 2024 and to become effective on 5 April 2024).

- [ICANN Board resolution](#) (21 January 2024) approving the Amendments of the Registry and Registrar Agreements regarding DNS Abuse

- [ICANN Board Resolution](#) (10 September 2023) based on [ICANN org assessment](#) of pending CCT and SSR2 Review pertaining to DNS Abuse Mitigation

- ICANN org [Public Comment Summary Report](#) (1 August 2023) on Public Comment proceeding related to the proposed Amendments of the Registry and Registrar Agreements regarding DNS Abuse

- [GAC Comments](#) (17 July 2023) on the proposed Amendments of the Registry and Registrar Agreements regarding DNS Abuse

- [Contractual Compliance November 2022 Round Registrar Audit Report](#) (22 June 2023)

- [Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations](#) (29 May 2023)

- [Inferential Analysis of Maliciously Registered Domains (INFERMAL)](#) announcement (25 April 2023)

- [GNSO Small Team on DNS Abuse Report to the GNSO Council](#) (7 October 2022)

- [The Last Four years in Retrospect: A Brief Review of DNS Abuse](#) by ICANN org (22 March 2022)

- European Commission [Study on DNS Abuse](#) and its [Technical Appendix](#) (31 January 2022)

- SSR2 Review [FInal Report](#) (25 January 2021) and related [GAC Comments](#) (8 April 2021)

Document Administration

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ICANN|GAC
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83 | POLICY FORUM

GAC Meeting with the GNSO Council

Session #5

Contents

Session Objective

The GAC and Generic Names Supporting Organization (GNSO) meet at ICANN Meetings to discuss policy matters of interest to both parties.

The agenda for the session is scheduled to focus on an exchange on the following topics:

1. **Introduction (5 minutes)**

2. **Accuracy of Registration Data (10 minutes)**

3. **DNS Abuse (10 minutes)**

4. **Registration Data Request Service (10 minutes)**

5. **Urgent Requests/Law Enforcement Authentication (8 minutes)**

6. **AOB (2 minutes)**

Talking Points & Questions

1. **Introduction**

   - Welcome by Chairs

   - High-level overview of what the GNSO does and how it does it

2. **Accuracy of Registration Data**

   - What are the GNSO Council's plans with the input received on the threshold questions, including what next steps the GNSO will take on this matter? What were the findings and recommendations of the GNSO Small Team that reviewed the input?

- What is the GNSO reaction to the GAC's submission?

- The GAC would appreciate updates on resuming the GNSO accuracy scoping teams and outreach on accuracy best practices

3. **DNS Abuse**

- The GAC would appreciate an update on DNS Abuse Small Team work and timeline for its outputs.

4. **RDRS**

- The GAC would like a status update of the report by the Standing Committee on RDRS. What are the GNSO's thoughts on next steps after the Standing Committee issues its final report?

- Additionally, the GAC would like an overview of how the RDRS addresses key elements and recommendations of the SSAD and an overview of additional policy work that may be required.

5. **Urgent Requests/Law Enforcement Authentication**

- The GAC acknowledges the ongoing work related to a reasonable timeline for urgent requests is being contemplated by the IRT and that this work is ongoing. The GAC would appreciate an update on the work of this group by the GNSO.

- What next steps does the GNSO believe would be appropriate after the recent IRT discussions?

6. **AOB**

Background

With the pace of GAC participation in ICANN policy development activities changing in recent years, it has been observed that information sharing with various parts of the ICANN community is more valuable than ever to help GAC members understand the context of various DNS issues. At recent public meetings, the GAC has interacted with various community groups from the gTLD space including business, intellectual property and non-commercial interests. This meeting with the GNSO Council will continue that strategic communications approach.

The Generic Names Supporting Organization (GNSO) is a body within the ICANN community responsible for developing and recommending to the ICANN Board substantive policies relating to generic top-level domains. The GNSO is the largest Supporting Organization within the ICANN framework.

The GAC normally meets with the Chair and other members of the GNSO Council at each ICANN public meeting to discuss issues of common concern and identify methods for better cooperation. The current Chair of the GNSO Council is Greg DiBiase. Vice Chairs are Nacho Amadoz and Tomslin Samme-Nlar. The GNSO Liaison to the GAC is Sebastien Ducos. The GAC's point-of-contacts to the GNSO are Manal Ismail (Egypt) and Rida Tahir (Canada).

The GNSO is a "federation" of different stakeholder groups. It is made up of two "Houses" - one "house" for parties contracted to ICANN (Registries and Registrars) and a second "house" for other non-contracted parties – commercial and non-commercial interests.

The GNSO Council and the GNSO stakeholder groups have different roles within the GNSO. The Council undertakes the role of manager of the policy development process. The Council is populated by representative members of the various GNSO stakeholder groups and constituencies. Comparatively, the stakeholder groups themselves (including the Registry Stakeholder Group (RySG) and the Registrar Stakeholder Group (RrSG) are focused on operational considerations, sharing information and helping their members understand the overall GNSO activities and responsibilities. Various stakeholder groups participate directly in policy development working groups.

Prior to ICANN Public Meetings, the leadership teams of both the GNSO Council and the GAC meet via teleconference to identify the most pressing issues that merit further face-to-face discussions at the upcoming meeting.

Further Information

Further information about the GNSO and its policy development process is available at http://gnso.icann.org/en/about. GNSO web site – https://gnso.icann.org/en

Document Administration

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GAC Meeting with the At-Large Advisory Committee (ALAC)

Session 6

Session Agenda

The GAC and the At-Large Advisory Committee (ALAC) regularly meet during ICANN Public Meetings to discuss public policy matters of interest to both government stakeholders and Internet end-users.

At ICANN83, the groups will continue to exchange views on topics of similar interest by focusing on:

1. Applicant Support Program (ASP) – Equity in the Next gTLD Round
2. Public Interest Frameworks and Advisory Roles

ALAC and GAC Discussion Focus

1. Applicant Support Program (ASP) - Equity in the Next gTLD Round

Focus: Promoting meaningful uptake of ASP and exploring how GAC and ALAC can jointly influence outreach and evaluation to support underserved applicants.

2. Public Interest Framework and Advisory Roles

Focus: Strengthening cooperation between GAC and ALAC in articulating and upholding the public interest in ICANN's policy development processes.

This topic offers a valuable opportunity to explore how both GAC and ALAC understand and operationalize the "public interest" in their advisory capacities. The ICANN83 session will include a short overview of the frameworks or guiding principles used by each group, that could support a focused and constructive discussion, particularly as ICANN advances into the new gTLD program next round.

Background

The ALAC is the primary ICANN-designated organizational home for the voices and concerns of individual Internet end users. Representing the At-Large Community, the 15-member ALAC consists of two members selected by each of the five Regional At-Large Organizations (RALOs) and five members appointed by ICANN's Nominating Committee. Advocating for the interests of end-users,

the ALAC advises on the activities of ICANN, including Internet policies developed by ICANN's Supporting Organizations.

The GAC and ALAC have been meeting at ICANN Public Meetings in order to coordinate and discuss ICANN policy issues of common interest. In the past they have worked to develop joint statements on certain policy and operational topics.

Key Reference Documents

- [ICANN83 GAC Briefing on New gTLD Program ext Round Session](#)

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GAC Meeting with ICANN Board
Session 7

Contents

Session Objectives

An ICANN Public Meeting creates the opportunity for the GAC to meet and interact with other ICANN groups, organizations and structures - enabling the committee to coordinate and resolve specific policy work and operational matters and to build channels of communication with other groups to address current issues of government interest and facilitate future informational exchanges.

The GAC Meeting with the ICANN Board of Directors is one of those traditional opportunities that takes place at every GAC Public Meeting. The Tuesday, 10 June GAC meeting with the ICANN Board at ICANN83 will enable the GAC to share views and ask timely questions of Board Members on topics of importance to governments in ICANN.

Recent Developments

Recent GAC-Board Meetings have covered a range of subjects and topics that have mostly centered around formal questions the GAC submits to the Board about two to three weeks before the start of the ICANN Public Meeting.

For some meetings, the Board presents a number of standard questions or session topics to community groups for them to respond to the Board. The Board has not proposed any specific questions for the GAC during ICANN83, but GAC members have developed a number of topics and questions for the Board.

With respect to the topics and questions from the GAC to the ICANN Board, during the ICANN83 Agenda Setting Calls on 3 April and 20 May, GAC members were asked to share potential topics and questions for compilation by GAC Support staff and subsequent curation from the GAC Chair and Vice Chair (C-VC) team.

As of 27 May 2025, the identified topics areas include:

1. ICANN Policy Development
2. Registration Data
    a. Urgent requests
    b. Authentication
3. Privacy and Proxy Accreditation Issues (PPSAI)
4. Community Statements of Interest

This initial list of topics for ICANN83 were scheduled to be shared with the Board on 28 May. GAC Members will review and confirm them (as well as any associated questions) during a special committee pre-meeting preparatory call scheduled for 3 June. Subsequently, the finalized topics/questions will be shared with the Board in preparation for the meeting.

Session Agenda

Session #7 - Tuesday, 10 June (1145 UTC) - GAC Meeting with ICANN Board

A preliminary meeting agenda for the joint meeting (as of 27 May) is:

    A. Introductions
    B. Review of GAC Topics/Questions to the Board (shared in advance of meeting)
    C. AOB
    D. Closing

Further Information

Other Board-GAC Interactions -

● Within the ICANN multistakeholder community, the GAC has a fundamental relationship with the ICANN Board of Directors that is detailed in the ICANN Bylaws (see ICANN Bylaws Section 12.2(a)) and the Board-GAC meeting is a regular feature of every ICANN Public Meeting - https://www.icann.org/resources/pages/governance/bylaws-en/#article12
● From time-to-time, the GAC also hosts a meeting of the Board-GAC Interaction Group (BGIG). For this meeting cycle, that meeting took place on 7 April 2025, during which Board members shared their reactions to the GAC Issues of Importance identified in the ICANN82 Communiqué. Information materials about that interaction can be found here - https://gac.icann.org/sessions/boardgac-interaction-group-bgig-call-7-april-2025

Topical Reference Documents -

    ● The Board Scorecard on ICANN82 GAC Issues of Importance (29 January 2025)
    ● ICANN Strategic Plan for Fiscal Years 2026-2030

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GAC Strategic Planning - GAC Operating Principles

Session 8

Contents

Session Objective

During this part of GAC Session #4, GAC Members will conduct discussion and the final "deciding vote" to determine whether to approve a proposal agreed to by GAC Members during ICANN82 to revise the GAC Operating Principles regarding the timing of annual committee leadership elections and the terms of the GAC Chair and the GAC Vice Chairs.

Leadership Proposal for GAC Action

1. **Committee final decision to proceed to** enable GAC leadership transitions to take place at the end of the ICANN Annual General Meeting when the ICANN Board and other ICANN communities also begin their leadership terms. It is expected that, like during ICANN82, the GAC Chair will seek an in-person show-of-hands vote by the GAC Members present on this matter pursuant to GAC Operating Principle #53.

2. **Committee final decision to proceed to** adjust the term of the GAC Chair to three consecutive terms of two years and the terms of the GAC Vice-Chairs to two consecutive terms of two years.It is expected that, like during ICANN82, the GAC Chair will seek an in-person show-of-hands vote by the GAC Members present on this matter pursuant to GAC Operating Principle #53.

Background

Pursuant to GAC Operating Principle 53, during ICANN82 GAC Members agreed on a proposal to proceed with a process to revise the GAC Operating Principles regarding the timing of annual committee leadership elections and the terms of the GAC Chair and the GAC Vice Chairs.

GAC members in attendance agreed to revise GAC Operating Principle 31 to adjust the committee's annual election cycle to conclude during the second meeting of the calendar year. This revision will enable leadership transitions to take place at the end of the ICANN Annual General Meeting when

the ICANN Board and other ICANN communities also begin their leadership terms. GAC Members in attendance also agreed to revise GAC Operating Principle 21 to adjust the term of the GAC Chair to three consecutive terms of two years and the terms of the GAC Vice-Chairs to two consecutive terms of two years.

Consistent with the GAC Operating Principles, the revision proposals were effectively subjected to a 60-day post-meeting consultation period and no comments or discussion took place on the GAC email list.

The GAC Support staff and Operating Principles Evolution Working Group will develop any needed transition procedures to effect the changes if they are ultimately approved.

References

- GAC Operating Principles - https://gac.icann.org/operating-principles/operating-principles-june-2017
- Relevant 8 March 2025 ICANN82 Session Link - https://icann82.sched.com/event/1vpVd/gac-operating-matters-discussion

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GAC Strategic Planning

Session 8

Contents

Session Objective

The GAC Leadership will discuss a revised timeline for developing the next GAC Annual Plan 2025/2026 in implementation of the GAC Strategic Plan 2024-2028 endorsed in the GAC ICANN80 Kigali Communiqué.

GAC Leadership "caretakers" are planning to highlight envisioned updates in Expected Outcomes for relevant Strategic Objectives in the new Annual Plan 2025/2026.

Leadership Proposal for GAC Action

1. **Consider contributing to the development of the next GAC Annual Plan 2025/2026** according to a revised timeline towards endorsement during the ICANN84 in Muscat, Oman in October 2025.

Background

The role of the GAC, as provided in the ICANN Bylaws[1], has traditionally led to the GAC adopting a generally reactive posture, conducting its work and providing advice or policy input in reaction to developments in various ICANN processes.

In some instances, such a posture has led to unsatisfactory outcomes for governments, for participants in the ICANN community or for the ICANN Board. This was particularly the case during the preparation and launch of the 2012 round of New gTLDs. Based on this experience, and in connection with governments' concerns regarding priority ICANN issues such as New gTLDs, Registration Data and DNS Abuse Mitigation, GAC leaders and volunteers have adopted a more proactive stance, aiming to drive and align ICANN policy outcomes with the public policy interests of governments.

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[1] See ICANN Bylaws, section 12.2(a)

Building on this evolution, the GAC Leadership has sought to cement a level of proactivity in GAC activities, in a more systematic fashion, with a view to increasing the Committee's readiness to provide timely and effective advice and policy input. To this end, in early 2024, the GAC Chair has invited GAC Topic Leads, GAC Working Group leaders and representatives of the GAC in various ICANN processes, to consider, in their respective areas of expertise, what should be the strategic priorities and objectives of the Committee for the foreseeable future.

The GAC Chair and Vice-Chairs proposed a set of 8 strategic priority areas, drawing from deliberations of the GAC over the recent past, as reflected in GAC Communiqués and the previous GAC Action/Decision Radar. Based on subsequent GAC discussions, the following strategic priority areas were agreed upon:
1. Role for Governments in ICANN
2. Effectiveness of the GAC
3. Future Round of New gTLDs
4. DNS Abuse
5. Domain Registration Data
6. Universal Acceptance
7. New Technology
8. Internet Governance
9. Internet Number Resources

For each of these areas, the GAC considered a set of Strategic Objectives to support a more proactive stance of the Governmental Advisory Committee in ICANN deliberations. These objectives were also expected to provide an opportunity for governments to discuss and align their interests within the GAC, and serve as a vehicle for communicating the GAC's priorities with higher levels of governments and ICANN stakeholders. They are laid out in the GAC 4-year Strategic Plan 2024-2028 which was endorsed by the GAC in its Kigali Communiqué (17 June 2024).

Further to these strategic objectives, the GAC considered and developed Expected Outcomes in a corresponding 2024/2025 GAC Annual Plan. This plan is now being revised for the upcoming period 2025/2026.

Recent Developments

As part of coordinating and tracking the implementation of the GAC Annual Plans, in collaboration with relevant GAC Topic Leads, the GAC Leadership assigned each strategic priority areas to one or several of the GAC Chair and Vice-Chairs to act as "caretaker", who are either directly involved in the delivery of the GAC's Expected Outcomes or engaged with the relevant GAC Topic Leads.

Current "caretaker" assignments, revised following the seating of the new GAC Leadership team at the end of the ICANN82 meeting is as follows:

1. Role for Governments in ICANN   **Jorge Cancio (CH)**
2. Effectiveness of the GAC   **Ian Sheldon (AU) + Zeina Bouharb (LB)**
3. Future Round of New gTLDs   **Marco Hogewoning (NL) + Thiago Dal-Toe (CO)**
4. DNS Abuse   **Thiago Dal-Toe (CO)**
5. Domain Registration Data   **Ian Sheldon (AU) + Thiago Dal-Toe (CO)**
6. Universal Acceptance   **Christine Arida (EG)**
7. New Technology   **Nicolas Caballero (Chair) + Christine Arida (EG)**
8. Internet Governance Awareness   **Christine Arida (EG) + Jorge Cancio (CH)**
9. Internet Number Resources   **Marco Hogewoning (NL)**

Following discussion during the ICANN82 meeting, the GAC will consider a revised **timeline and process to develop the next GAC Annual Plan for the period 2025/2026,** accounting for more time needed to coordinate with GAC Topic Leads on the reconsideration of certain Expected Outcome.

The proposed revised timeline is as follows:

Annual Plan 2025/2026: Milestones To ICANN84
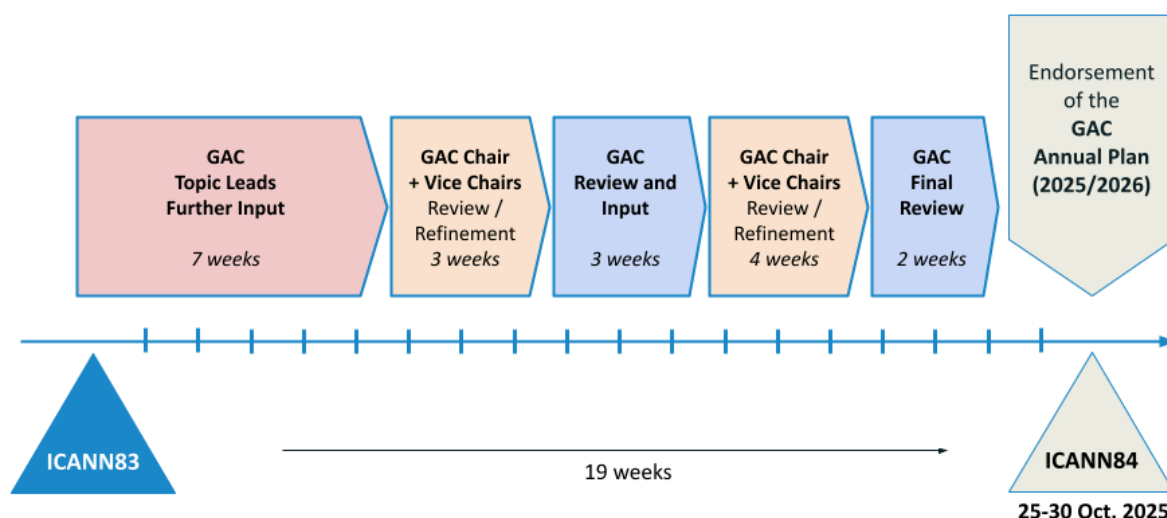
Key Reference Documents

- [GAC Strategic Plan 2024-2028](#) endorsed in the [Kigali Communiqué](#) (17 June 2024)

- [GAC Annual Plan 2024/2025](#) endorsed in the [Kigali Communiqué](#) (17 June 2024)

- [GAC Annual Plan 2024/2025 Progress Tracker](#)

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GAC Session on Security and Stability

Session 10

Session Agenda

During the security and stability themed session, the GAC will be meeting with the Security and Stability Advisory Committee (SSAC) on issues of common interest with the GAC, followed by a session with the SIDNLabs on matters related to DSSEC and Quantum.

Members of the SSAC will share information with GAC representatives on the latest developments in areas where they have common or overlapping interests with GAC member governments. Attendees will explore opportunities for future collaboration with the GAC on key topics.

The topics identified for bilateral discussion between the GAC and SSAC during this ICANN83 session include:

1. Domain registration data access
2. Update on the SSAC Free and Open-Source Software Work Party
3. Briefing on SSAC report on DNS Blocking

Subsequently, SIDN Labs will provide an overview to the GAC on the Post-quantum Algorithm Testing and Analysis for the DNS (PATAD) project developed with the University of Twente and SURF, and will discuss alternative paths for making DNSSEC Post-quantum Cryptography-ready to give GAC members a broader perspective on the solution space, as government organizations will need to prepare for upcoming possibly substantial changes in the DNS to implement the new algorithms and roll-over the cryptographic key material.

Background on SSAC

The SSAC advises the ICANN community and the ICANN Board on matters relating to the security and integrity of the naming and address allocation systems of the Internet. These include operational matters such as those pertaining to the correct and reliable operation of the Root Server System; administrative matters such as those pertaining to address allocation and Internet number assignment; and registration matters such as those pertaining to registry and registrar services like WHOIS. The SSAC also engages in ongoing threat assessment and risk analysis of the Internet naming and address allocation services to assess where the principal threats to stability and security lie, and advises the ICANN community accordingly.

SSAC members are technical security professionals who volunteer their time and expertise to improve the security and integrity of the Internet's addressing system. The SSAC produces reports,

[correspondence, and comments](#) on a range of topics for the ICANN Board, the ICANN community, and the broader Internet community. The SSAC documents how the SSAC carries out its own work and the accumulated rationale in the [SSAC Operational Procedures](#).

1. Domain Registration Data Access

The SSAC has previously worked on domain registration data access issues, including in the publication [SAC122: SSAC Report on Urgent Requests in the gTLD Registration Data Policy.](#) This publication contained three recommendations: The first on structure for urgent requests so that the process is handled in an expedited manner; the second on a policy for response times; and the third requesting the ICANN organization to compile data on urgent requests for the ICANN community. Other efforts include [SAC101v2: SSAC Advisory Regarding Access to Domain Name Registration Data](#) and [SAC118:SSAC Comments on Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team - Phase 2A.](#)

2. SSAC Free and Open-Source Software Work Party

The SSAC has a current work party nearing completion that looks at how the Domain Name System (DNS) runs on free and open source software (FOSS). FOSS is often maintained by non-profit, volunteer, and commercial actors in a complex equilibrium. This report investigates and analyzes the data of how operators in the DNS utilize open source software, while addressing some common misconceptions about it. SSAC seeks to inform policy making efforts or regulatory interventions that seek to discuss, alter or regulate the development or subsequent use in infrastructure of software without due consideration of the role of open source software in the core of the Internet. This report will also present original data on the role of FOSS in the DNS and original survey data on the anticipated impacts of regulation on the open source model.

3. SSAC Report on DNS Blocking

The SSAC has just published its report [SAC 127](#), entitled: DNS Blocking Revisited. DNS blocking is a method for restricting access to information or services on the Internet by interfering with the normal process of responding to DNS queries about domain names or Internet Protocol addresses. This report focuses on the technical means by which DNS content blocking can be accomplished, and the effects—both intended and unintended—of its use in different contexts. The aim of this report is to advise the Internet community, and especially policymakers and government officials, of the implications and consequences of using DNS blocking to control access to resources on the Internet.

The three recommendations in SAC127 are addressed to any organization involved in implementing or mandating DNS blocking and to operators of recursive servers. The SSAC advises

that all such entities fully grasp the implications of DNS blocking, that those implementing it adhere to clear operational guidelines to minimize risks and collateral damage, and that server operators utilize DNS Extended Error codes for transparency. This report updates previous SSAC publications: SAC050 and SAC056, which were respectively published in 2011 and 2012. Since then, relevant Internet technologies and practices have evolved, and more examples of DNS blocking have been implemented.

Background on SIDNLabs

SIDN Labs is the research team of SIDN, the operator of the .nl top-level domain. The purpose of SIDN Labs is to further enhance the security and robustness of .nl and the broader internet infrastructure in the Netherlands, Europe and the rest of the world through applied technical research. We do this based on large-scale Internet measurements and analysis, and the design, prototyping and evaluation of new Internet technologies and systems. Our research focuses on domain name security, security of Internet core systems (DNS, BGP and NTP), and emerging Internet technologies such as post quantum cryptography.

References

- More information on the PATAD PQC DNSSEC Testbed

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ICANN|GAC
Governmental Advisory Committee

83 | POLICY FORUM

WHOIS and Registration Data Issues

Session 11

Contents

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), a pilot program launched as proof of concept for a permanent System for Standardized Access/Disclosure (SSAD) per EPDP Phase 2 Policy Recommendations;
- 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 continued discussions of the future of the Registration Data Request Service (RDRS)** by the GNSO Standing Committee following the ICANN Board's support for it 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. The main objectives are to ensure:

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

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[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.* [...]"

[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*"

b. **Mandatory participation of registrars** considering that only 60% of gTLDs are currently covered by the RDRS

c. **Integration of affiliated proxy services** (Registrar operated), to facilitate access to underlying contact information of the beneficial user of a domain name

d. **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 progress of GNSO discussions on accuracy of registration data** in gTLDs, following the convening of a [GNSO Small Team on Registration Data Accuracy](#) which is tasked to analyze the responses to the recent GNSO consultation of community groups, including [GAC Input](#) (14 February 2025), and to propose next steps for the GNSO Council following the suspended work of the Accuracy Scoping Team since November 2022[3], and [ICANN org's analysis](#) (13 October 2023) of limited avenues available to assess accuracy of registration data.

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[3] See GNSO Council [Resolution 20221117-4](#) (17 November 2022), [Resolution 20230720-1](#) (20 July 2023), and [Resolution 202402150-3](#) (15 February 2024) and Resolution [20240919-4](#) (19 September 2024)

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 13 months of usage data[4]**, part of which was summarized below ahead of ICANN80. 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).

RDRS - Usage Metrics Since Launch (as of Oct 2024)
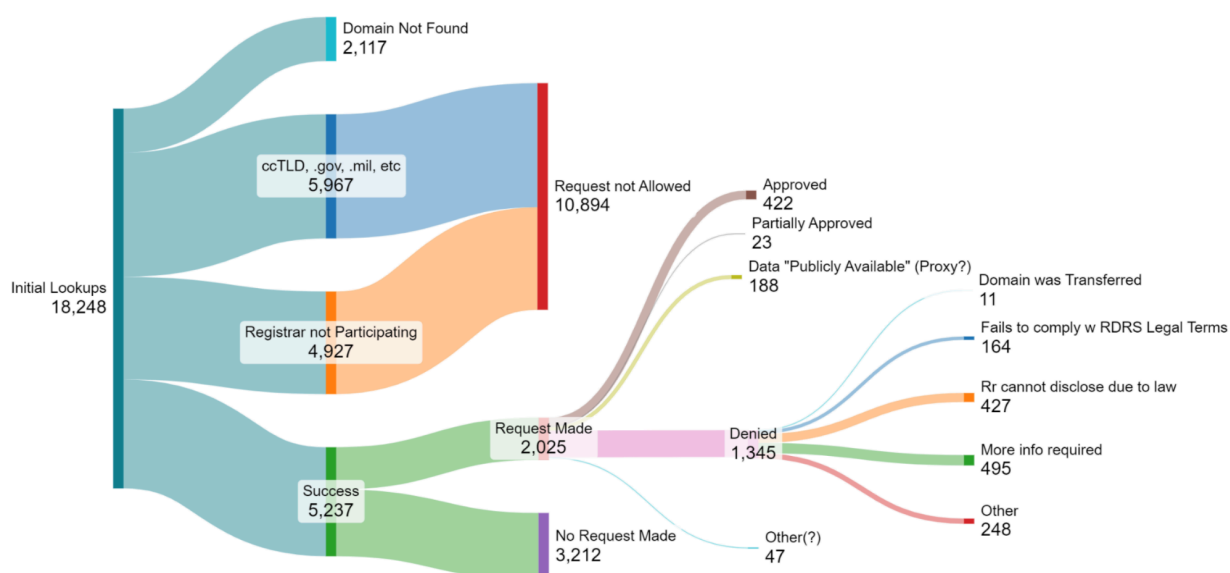
As reported during ICANN81:

- There were 6,593 requestors registered in RDRS, responsible for 18,248 domain lookups, and 2,025 actual disclosure requests.

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[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 ICANN81 Prep Week update session to be held on Thursday 31 October at 2200 UTC.

- About one third of lookups are for domains using TLDs not included in RDRS (such as ccTLDs), and another third of lookups are for domains associated with non-participating registrars.
- When requestors were allowed to proceed to submit a disclosure request, about 60% of the time no disclosure request is made
- Of all the initial lookups in the RDRS Tool, 3% turned into disclosure Approved (422) or Partially Approved (23).
- RDRS would be more useful if Registrars would respond on behalf of their Proxy Services (see 188 "Data Publicly Available" responses to requests).

The table below displays the monthly counts and totals, expressed as both numbers and percentages, of disclosure requests by request type. Note that totals include canceled requests that are not reflected in the summary table totals.

Request Type	2023		2024												2025				Total	Total %
	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr		
Other	8	23	14	57	112	83	31	38	65	83	72	45	16	64	59	52	28	11	861	29.1%
IP Holder	20	49	107	116	71	43	35	49	66	24	35	23	33	29	39	36	26	33	834	28.2%
Law Enforcement	1	17	38	30	25	45	38	49	20	7	32	27	19	8	8	27	18	69	478	16.2%
Consumer Protection	4	12	51	6	18	10	10	11	5	15	12	4	13	14	25	5	3	12	230	7.8%
Research (non-security)	8	13	16	5	8	8	1	3	1	7	12	7	10	17	8	13	3	5	145	4.9%
Litigation/Dispute Resolution (non-IP)	1	5	26	3	1	1	18	11	0	6	9	10	2	8	8	0	3	8	120	4.1%
Security Researcher	2	31	15	14	8	3	2	2	1	3	4	5	2	3	2	3	5	2	107	3.6%
Domain Investor	1	9	8	3	5	4	2	4	1	6	10	5	5	10	8	1	1	3	86	2.9%
Computer Security Incident Response Team (CSIRT)	0	8	6	3	2	1	2	1	4	1	0	0	0	3	0	0	1	1	33	1.1%
Dispute Resolution Service Provider	0	2	3	4	1	6	1	0	0	3	3	1	2	1	2	0	2	1	32	1.1%
Cybersecurity Incident Response Team (non-CSIRT)	0	3	2	1	3	4	1	1	1	0	0	4	1	0	2	6	1	0	30	1.0%
Total	45	172	286	242	254	208	141	169	164	155	189	131	103	157	161	143	91	145	2956	100%

Source: [Registration Data Request Service Usage Metrics](#) (9 May 2025)

- In the ICANN82 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.

- **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)

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[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 SSAD[7].

- 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*

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[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](link) (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](link) (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](link) (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](link) (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**.

○ Since the beginning of the year, the [GNSO RDRS Standing Committee](link) has been drafting its Final Report consistent with its 4 assignments as laid out in its [Charter](link) (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.

- **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 Board[8].

    - 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)[9].

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

[9] 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. **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 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. GAC and Contracted Parties representatives are expected to meet next during ICANN83 in Prague.

- **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[10] 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.*

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[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, more than a dozen meetings have taken place and have focused on:
   – Reviewing, clarifying and commenting on an editable version the [Final Report of the PPSAI PDP Working Group](#) (7 December 2015)
   – Assessing the need to revise the previously drafted [law enforcement authority and intellectual property disclosure frameworks](#) (12 September 2018) to reflect the new data protection legal and policy environment.

○ Recording and documentation of the IRT is accessible on a dedicated [community page](#).

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[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 GSNO 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 required[12] 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) [...]"*.

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[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 data[13]. 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*

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[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, after ICANN83, possibly by July 2025.

○ 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** "c*onsiders [...] 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 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

- Registration Data Request Service (RDRS)

  - [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 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 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

  - [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

  - ○ [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. Commuiqué (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	ICANN83 GAC Session Briefing - WHOIS and Registration Data Issues
Distribution	GAC Members (before meeting) and Public (after meeting)
Distribution Date	Version 1: 28 May 2025

GAC Meeting with the Address Supporting Organization (ASO)

Session 12

Session Objective

The GAC will be meeting with the Address Supporting Organization (ASO) to discuss public policy matters of mutual interest and particularly on matters pertaining to the governance of the RIR system, including the criteria for the (de)recognition of Regional Internet Registries (ICP-2).

Current Status and Recent Developments for discussion at ICANN83

At the moment, the ASO is in the process of developing a successor to the ICP-2 Criteria for Establishment of New Regional Internet Registries. A draft proposal for a new "Governance Document for the Recognition, Maintenance, and Derecognition of Regional Internet Registries (RIRs)" has recently been published for public comment.

At ICANN83, the GAC and the ASO will follow up on intersessional discussions including the public comment proceeding and focus on the feedback received. We will discuss potential next steps to address the comments received by government stakeholders and further opportunity for GAC to contribute to the development of this new governance document.

This process was introduced to GAC members during the ICANN81 public meeting in Istanbul. Prior to the session in Prague, the GAC members had the opportunity to be briefed by the ASO during a webinar dedicated to the RIR Governance document (ICP-2) draft public comment process.

Background

The ASO is one of ICANN's three Supporting Organizations (SOs) that reviews and develops recommendations on Internet Protocol (IP) address policy and Autonomous System Numbers (ASN) and advises the ICANN Board on policy issues relating to the operation, assignment, and management of IP addresses and ASNs.

The ASO does not develop policy relating to Internet number resources itself but rather ensures that the Global Policy Development Process (GPDP) has been correctly followed in each Regional Internet Registry (RIR) region.

- **ASO and NRO**

The Address Supporting Organization (ASO) and the Number Resource Organization (NRO) are two separate bodies. While they are closely linked, they each have distinct responsibilities.

The NRO, as the coordinating body for the five RIRs, fulfills the role, responsibilities and functions of the ASO. These functions and responsibilities are outlined in the ICANN-ASO Memorandum of Understanding (MoU).

The NRO provides secretariat support for the ASO, acts as a coordinating mechanism for the five RIRs and participates, as the ASO, in the ICANN Empowered Community.

- **ASO Address Council**

The ICANN-ASO MoU states that the ASO shall have an Address Council (ASO AC) consisting of the 15 members of the Number Resource Organization (NRO) Number Council (NRO NC).

Among other activities, the ASO AC oversees the GPDP, provides recommendations to the ICANN Board on the management of IP address space and the recognition of new RIRs, and appoints Directors to serve in the ASO's two seats (Seat 9 and Seat 10) on the ICANN Board.

Each of the five RIRs appoints three members to the ASO AC. Each RIR's community appoints two members and one member is appointed by the RIR's Executive Board.

While similar in name, the ASO and the ASO AC are distinct groups and have separate responsibilities.

- **Global Policies on Internet Number Resources**

Global policies govern how Public Technical Identifiers (PTI), the organization charged with performing the IANA functions, issues Internet number resources to the Regional Internet Registries (RIRs). The RIRs then distribute these Internet number resources to their members according to the regional policies developed by their respective communities.
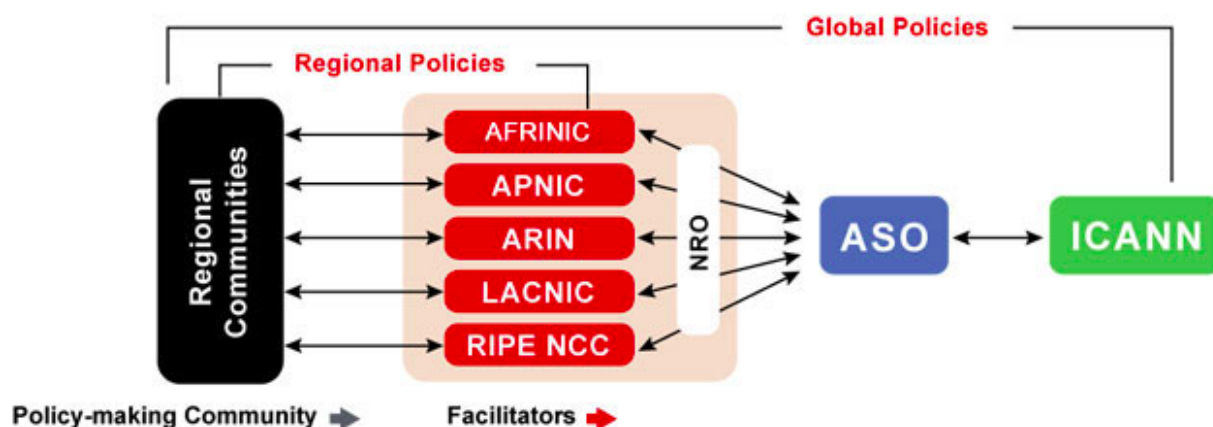
- **Updating ICP-2 Criteria for Establishment of New Regional Internet Registries**

On 25 October 2023, the Number Resource Organization Executive Council (NRO EC) asked the ASO AC to establish and manage a process to propose updates to the Internet Coordination Policy 2 (ICP-2) document, in consultation with each of the RIR communities, to provide the RIR system with greater accountability to the Internet community.

On 08 October 2024, a first public comment was submitted soliciting community feedback on the ICP-2 version 2 principles document. Subsequently, the ASO AC proceeded with a full version of a proposed revised ICP-2 document based on the feedback received in order to present that document to the same stakeholders for further feedback.

On 14 April 2025, the public comment proceeding on Governance Document for the Recognition, Maintenance, and Derecognition of RIRs was launched and sets forth the
- Rules and criteria for recognizing new RIRs
- Operating obligations and requirements of RIRs
- Rules and criteria for derecognizing RIRs

If adopted by ICANN and the RIRs, the RIR Governance Document would supersede and replace the Internet Coordination Policy 2 (ICP-2).

Document Administration

Title	ICANN83 GAC Session Briefing - GAC Meeting with the ASO
Distribution	GAC Members (before meeting) and Public (after meeting)
Distribution Date	Version 1: 28 May 2025

ICANN83 GAC Schedule (as of 28-May-2025)

UTC	UTC +2	Monday 9 June 2025 (Day 1)	Tuesday 10 June 2025 (Day 2)	Wednesday 11 June 2025 (Day 3)	Thursday 12 June 2025 (Day 4)	UTC +2
7:00	9:00	**1. GAC Opening Plenary** (75 mins)	**4. GAC Discussion on DNS Abuse Mitigation** (75 mins)	**10. GAC Session on Security and Stability** *GAC Meeting on DNS Blocking and OSS with the SSAC (35 mins) GAC Meeting on DNSSEC and Quantum with SIDNLabs (35 mins)* (75 mins)	**13.c. GAC Communique Drafting** (75 mins)	9:00
7:15	9:15					9:15
7:30	9:30					9:30
7:45	9:45					9:45
8:00	10:00					10:00
8:15	10:15					10:15
8:30	10:30	Break (30 mins)	Break (30 mins)	Break (30 mins)	Break (30 mins)	10:30
8:45	10:45					10:45
9:00	11:00	**2. GAC Capacity Development** New gTLD Program Next Round (AGB) (90 mins)	**5. GAC Meeting with the GNSO** (45 mins)	**11. GAC Discussion on WHOIS and Registration Data Issues** (45 mins)	**13.d. GAC Communique Drafting** (90 mins)	11:00
9:15	11:15					11:15
9:30	11:30					11:30
9:45	11:45		**6. GAC Meeting with the ALAC** (45 mins)	**12. GAC Meeting with the ASO on ICP-2** (45 mins)		11:45
10:00	12:00					12:00
10:15	12:15					12:15
10:30	12:30	Lunch Break (90 mins)	Lunch Break (90 mins)	Lunch Break (90 mins) *[GAC Leadership Meeting]*	Lunch Break (90 mins)	12:30
10:45	12:45					12:45
11:00	13:00					13:00
11:15	13:15					13:15
11:30	13:30					13:30
11:45	13:45					13:45
12:00	14:00	**3. GAC Discussion on New gTLDs Next Round** (75 mins)	**7. GAC Meeting with the ICANN Board** (75 mins)	**GNSO Council Meeting** (13:45-14:45) / **13.a. GAC Communique Drafting** (75 mins)	**13.e. GAC Communique Drafting** (75 mins)	14:00
12:15	14:15					14:15
12:30	14:30					14:30
12:45	14:45					14:45
13:00	15:00					15:00
13:15	15:15	Break (30 mins)	Break (30 mins)	Break (30 mins)	Break (30 mins)	15:15
13:30	15:30					15:30
13:45	15:45	**Community Session on WSIS+20** (90 mins) *[In GAC meeting room]*	**8. GAC Strategic Planning and Operating Matters Discussion** (60 mins)	**13.b. GAC Communique Drafting** (90 mins)	**Working Session on How We Meet** (90 mins) / **13.f. GAC Communique Drafting** (90 mins) (if needed)	15:45
14:00	16:00					16:00
14:15	16:15					16:15
14:30	16:30		**9. GAC Communique Review** (30 mins)			16:30
14:45	16:45					16:45
15:00	17:00	Opening Reception (60 mins)	Networking Cocktail (60 mins) / Nigel Hickson Memorial (17:45-19:00)	Networking Cocktail (60 mins)	Closing Reception (60 mins)	17:00
15:15	17:15					17:15
15:30	17:30					17:30
15:45	17:45					17:45
17:00	18:00					18:00

GAC Plenary Sessions
GAC Joint Sessions
Community Sessions
GAC Communique
GAC Capacity Development

Official Times for ICANN83 09:00-17:00 (UTC+2)