ICANN | GAC
Governmental Advisory Committee

87 ANNUAL GENERAL MEETING

GAC Meeting with the Commercial Stakeholder Group (CSG)

Session 10

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Session Objective

During this session, representatives of the Generic Names Supporting Organization's Commercial Stakeholder Group (CSG) will join GAC representatives to discuss shared concerns and practical solutions in areas where they have common or overlapping interests.

The agenda for the session will focus on the following topics:

1. **DNS Abuse**
2. **Registration Data**
3. **Review of Reviews**

Questions

The CSG requested this joint session following issues highlighted by the GAC in the ICANN86 Seville Communiqué concerning Review of Reviews, DNS Abuse and Registration Data. The CSG has indicated that it shares a number of the GAC's concerns in these areas and would like the discussion to explore practical, business-oriented solutions that could be advanced by the ICANN community, including through operational implementation that may not require new policy development.

The CSG is particularly seeking an exchange with GAC members on relevant concerns, risks and public policy considerations.

This will be the CSG's first engagement with the full GAC, although the CSG has previously engaged with the GAC Public Safety Working Group (PSWG) on areas of mutual interest. The CSG has proposed a discussion format involving contributions from both CSG and GAC representatives on each of the three topics, followed by broader discussion among participants.

1. **DNS Abuse: Practical mitigation steps**
    - Identify areas of alignment between the GAC and the CSG regarding PDP1 and PDP2 (Proposed by the GAC)
    - Exchange views on priorities for DNS abuse at ICANN, beyond the upcoming PDP processes
    - Which of the priorities listed in the Prague Communique does the GAC want to see the community pursue now that PDP1 recommendations are substantially complete and PDP2 is kicking off, and why? Will the GAC be providing advice in this regard?

2. **Registration Data: Approaches to developing a workable model for accuracy and access**
    - Authentication / equitable access: How the SSAD authentication framework can accommodate legitimate requestors beyond law enforcement ?
    - Effective access to underlying privacy/proxy registration data: The GAC and CSG should seek common ground on ensuring that privacy/proxy services do not become an obstacle to legitimate investigations
    - Meaningful response standards, prioritization, and accountability: Whether the proposed SSAD SLAs and response requirements will produce timely and useful outcomes for legitimate requestors
    - 15 day verification timeline (GAC Question): What are CSG's views the existing 15-day timeline for verification of registrant email or telephone number? Does the CSG foresee any particular challenges with requiring verification to be completed before a newly registered domain name becomes operational?

3. **Review of Reviews: Structural aspects and potential approaches for addressing the issue**
    - The CSG is seeking an informal exchange of views on the current proposal, conscious of the GAC's recent input to the RoR draft report public comment as well as limitations that would apply to the GAC.
    - CSG to share its respective views on next steps

Background and Recent Development on the Proposed Agenda Items

DNS Abuse

Since the GAC issued Consensus Advice to the ICANN Board in the GAC Prague Communiqué (16 June 2025) "*To urge the GNSO Council to undertake all necessary preparations prior to ICANN84 towards starting targeted and narrowly scoped Policy Development Processes (PDPs) on DNS Abuse issues, prioritizing bulk registration of malicious domain names and the responsibility of registrars to investigate domains associated with registrant accounts that are the subject of actionable reports of DNS Abuse*", **ICANN Community discussion of DNS Abuse have centered around:**

- **The prioritization of policy gaps** to be considered for policy development, possible contractual amendments, and other initiatives such as industry best practices: this resulted in the adoption of the Final Issue Report on a Policy Development Process on DNS Abuse Mitigation (4 December 2025) and the launch of a GNSO policy development process in two phases to consider mandating *Associated Domain Checks* by Contracted Parties (PDP1, as well *Safeguards for access to domain name registrations at scale for new customers* (PDP2)

- **PDP1 deliberations on Associated Domain Checks, which have reached the stage of publication of initial recommendations** in the DNS Abuse Mitigation PDP1 Working Group Initial Report (18 August 2026), regarding which the GAC provided Comments (28 September 2026), among the 40 submissions received.
    - The Registry Stakeholder Group (RySG) Comment expressed complete support for the initial recommendations
    - The Registry Stakeholder Group (RrSG) Comment also expressed overall support for the recommendations while stressing that:
        - The ADC policy should not create a requirement "*for registrars to collect or generate new data solely for the purpose of conducting an ADC*" while other stakeholders have argued that the policy should provide for ICANN Compliance to be able to audit applicable records demonstrating the extent of the ADC performed in applicable instances.
        - Success in DNS Abuse mitigation should not be measured in number of suspended domains or number of ICANN Contractual Compliance cases (inquiries and notices) but rather consider that "*If threat actors change their tactics, this means that we have succeeded in disrupting them*".

- **PDP2 chartering discussions**, which have taken place in recent months in a Drafting Team on the Draft PDP2 Charter. Because the GAC does not hold an observer seat in the GNSO Council, it cannot join such a drafting team. However, following discussion among topic leads and liaisons of the GAC and the GNSO, the GNSO leadership invited the GAC to submit a one-time input for consideration in this drafting process.
    - The GAC Small Group on DNS Abuse thus provided, on behalf of the GAC, GAC Input on the PDP2 Charter (25 September 2026) which highlighted:
        - The need for the charter language to be technology neutral
        - That discussion of registrants' recourse should be out of scope and moved to a dedicated, separate policy effort, and that adverse impact to end user

rights of ineffective safeguards to prevent malicious registrations for DNS Abuse campaigns should be considered throughout the process
    - The need for the PDP to require registrars to enforce obligations and controls over resellers and agents authorised to access registrar platforms
    - That the envisioned Safeguards should apply based on the high-speed high-volume capability being provided, irrespective of the technology or arrangements involved.
  - The Registry Stakeholder Group (RySG) Input provided at the start of the process highlighted, inter alia, that this PDP should:
    - Focus on adding reasonable safeguards to the utilization of registrar domain name registration tools by new and existing customers and/or partners, including resellers with the goal to reduce the prevalence of malicious registrations.
    - Balance policy outcomes that do not add unreasonable burden to registrars and legitimate registrants.
    - Narrow the scope to domain name registration tools offered by the registrar and/or partners, including resellers at scale.
  - The Registrar Stakeholder Group (RrSG) Input provided at the start of the process argued, among other suggested changes, that:
    - The INFERMAL study (8 November 2024) which has contributed to drawing attention to the role of API registration in DNS Abuse, "concluded without evidence" that the presence of easy automation for domain name registrations can multiply the likelihood of abuse by roughly four times (as written in the draft charter)
    - The policy should aim at determining which domain registration capabilities offered by registrars (that enable new customers to register domain names in an automated fashion) should be subject to policy requirements

- **The 15-day timeline for registrars to verify registrants' contact information.**
  - Since the GAC Dublin Communiqué (3 November 2025), the GAC Mumbai Communiqué (16 March 2026), and the Seville Communiqué (15 June 2026), the GAC:
    - Reaffirmed interest in reviewing the current rules, particularly ahead of the delegation of new gTLDs strings, taking into account all relevant aspects of this issue, including potential operational and financial challenges to registrars
    - Recommended that registrars be required validation and verification of registration data before a newly registered domain name can become accessible through the DNS,
    - Encouraged ICANN org undertake a holistic assessments of the evolution of technologies and registration practices that may affect the accuracy and reliability of domain registration data,

        - Proposed that a possible path to be further explored in this regard is contract amendments, while the GAC continues to consider the best path for efficient implementation.
        - Called for the ICANN community to maintain an active forum in which to continue discussing possible next steps related to accuracy.
    - Following the ICANN86 discussion of this matter between the GAC, Registrar and GNSO leadership (9 June 2026), during a pre-ICANN87 call between GAC and Registrar Topic Leads (28 September 2026) registrar representatives:
        - Clarified that the RrSG does not currently have a formal position on changing the timeframe and is continuing to discuss the issue with its membership, including during ICANN87
        - Emphasized the potential impact on domain owners if a shortened timeframe leads to suspension before verification is completed, as it could affect active websites, businesses, or other services, and increased support costs can be significant relative to the revenue associated with an individual domain registration

In the meantime, the GAC continues to consider GAC and community input on the proposals regarding future DNS Abuse policy development in response to the public comment proceeding on the Preliminary Issue Report on a DNS Abuse PDP (8 September 2025), and particularly GAC Comments (18 October 2025) with regards to **possible paths to address the remaining issues** (or "gaps") included in the Preliminary Issue Report but not currently prioritized for immediate policy development, and which remain GAC priorities, such as:

a. **Proactive monitoring as part of preventative measures** (see gaps "P6. Challenges in Real time Detection of Short Lived Abuse" p.15 of the Preliminary Issue Report, and "P7. Underuse of Predictive Algorithms for Early Detection" p.16);
b. **Addressing registration data accuracy** (see gaps "P2 and P3:Lack of proactive/Timely contact verification" which recall the recommendation of the GNSO Small Team on accuracy of registration data; and "P8. No Post-Registration Identity Checks for Suspicious Activity);
c. **Increased transparency in the reporting obligations** (see gap "C1. Limited Transparency in Mitigation Actions" p.23);
d. **Consensus policy on subdomain abuse** (see gap C4 "Unregulated subdomain abuse" p.26)
e. **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 "Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks" p. 32)

Registration Data: SSAD Supplemental Recommendation Team (SRT)

- **The SSAD SRT is due to propose modifications to the 2020 policy recommendations for a System for Standardized Access/Disclosure (SSAD)** in an expected Public Comment proceeding after ICANN87, taking into account:
    - GAC Comments (29 Sept. 2025) on the RDRS Standing Committee Report (19 August 2025) including the GAC recognition "*that the original package of EPDP Phase 2 recommendations may benefit from revision in light of RDRS findings [...]*" but concerns "*that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations [...]*"
    - The ICANN Board resolution (30 October 2025) on the continuation of the RDRS for up to 2 years "while the community continues its deliberations regarding the future of the service and related policy recommendations", urging "*the GNSO Council to ensure that future policy work on the System for Standardized Access/Disclosure (SSAD) recommendations is aligned with policies related to requests for underlying registration data for domains registered under privacy and proxy services, an enforceable timeline for urgent requests, and other relevant procedures*."
    - GAC Comments (15 December 2025) on the ICANN org RDRS Policy Alignment Analysis in which the GAC expressed support for the proposed enhancements of RDRS which it considers shared goals with the ICANN Board, including:
        - Mandatory registrar participation, as presumed under most adopted consensus policies;
        - A requirement for registrars with affiliated privacy and proxy services to also respond to RDRS requests for underlying privacy/proxy customer contact data as part of their disclosure decision process;
        - Better integration for registrars' systems and requestors' systems with the request portal;
        - Operational options for country code top-level domains (ccTLDs) to voluntarily participate in the RDRS or a successor system
    - The assignment of the SSAD Supplemental Recommendations Team

- **The SSAD SRT** has been meeting several hours every week since before ICANN86 and has gone through several readings of the proposed modified SSAD recommendations before these can be finalized and published for community review. The SRT will meet for a full day prior to the start of ICANN87 (Thursday 15 October) and will meet three times during ICANN87 (Saturday 17 at 16:30, Mon. 19 at 15:00 and Wed. 21 October at 16:30 local time)

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

- Recommendation 8: Contracted Party Disclosure Decision

- Regarding Authentication, in the Seville Communiqué (15 June 2026), the GAC called on the SSAD SRT to "*work toward outcomes that enable ICANN policy to distinguish between authenticated and unauthenticated requests, as authentication could be useful even when a disclosure request is not "urgent" as defined in the urgent requests policy*.
- The ICANN87 GAC plenary Session on Registration Data (planned on Sunday 18 October, prior to this GAC bilateral meeting) will feature an overview of key recommendations and highlight areas of potential GAC Comment when these recommendations are published for review by the Community after ICANN87.

Registration Data: Privacy/Proxy Services Accreditation Policy (PPSAI)

- The reconvened PPSAI IRT is currently considering the proposed Draft ICANN Consensus Policy in implementation of the 2015 GNSO Policy Recommendations which aim to create a framework to standardize business practices including regarding disclosure of underlying registration data when such services are involved in domain name registration.
- The GAC's representatives in this process (United States and a PSWG Co-chair) are actively participating in deliberations about the proposed draft Consensus Policy. The ICANN87 GAC plenary Session on Registration Data (planned on Sunday 18 October, prior to this GAC bilateral meeting) will feature an overview of key themes being discussed.
- In the GAC Seville Communiqué (15 June 2026) the GAC:
  - Urged the PPSAI IRT to work toward **establishing an accreditation system that helps prevent misuse of privacy and proxy services**, in which registration data records should reliably indicate whether a privacy or proxy service was used in a registration and provide information about the service used, so that parties with a legitimate interest know where they can direct inquiries, regardless of how many resellers or other intermediaries are involved in a registration.
  - Underscored the importance of the PPSAI Final Report recommendation which state that "***Registrars are not to knowingly accept registrations from privacy or proxy service providers who are not accredited*** *through the process developed by ICANN.*"
  - Stressed that the privacy and proxy service accreditation system should provide a path to **address cases of unaccredited operators offering their own privacy or proxy services**, regardless of whether such unaccredited services are offered by affiliates of registrars, resellers, and other intermediaries operating within the registration chain.
  - Reiterated that **the RDRS or its successor system should integrate support for disclosure requests** related to data underlying privacy and proxy registrations.

Review of Reviews

The CSG has identified the Structural Review as a particular area it would like to discuss with the GAC during the bilateral. Some within the CSG have advocated for the Structural Review to take place as early as possible, including on the basis that it could help inform subsequent reviews.

Within the Reviews Cross Community Group (CCG), there was no support for the Structural Review to take place first, except from the Internet Service Providers and Connectivity Providers Constituency (ISPCP). The group instead supported beginning with the Accountability and Transparency Review (ATR), which is already envisaged under the ICANN Bylaws, while preparations for the Structural Review could proceed in parallel. The CCG also reached a compromise around a 15-year review cycle, with On-Demand Reviews remaining available to address pressing structural issues between scheduled reviews.

There does not currently appear to be an explicit collective GAC position on the sequencing of the Structural Review. During the bilateral, the GAC Topic Leads would briefly outline where the Reviews CCG discussions currently stand before opening the floor for individual GAC members to share their views.

Key Reference Documents

- Review of Reviews Draft Report (25 June 2026)
- Review of Reviews Cross Community Group Webpage

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