ICANN | GAC
Governmental Advisory Committee

ICANN 87 ANNUAL GENERAL MEETING

GAC Meeting with the Contracted Parties House (CPH)

Session 15

Session Objective

During this session, representatives of the Generic Names Supporting Organization's gTLD Registries Stakeholder Group (RySG) and the Registrars Stakeholder Group (RrSG) will join GAC representatives to discuss the latest developments in areas where they have common or overlapping interests.

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

1. **Next Round and NTAG**
    a. Introduction to NTAG as a resource for GAC members
    b. Questions and discussion with GAC members
    c. Early engagement and communication between GAC members and applicants, including in the context of GAC Early Warnings
2. **How to Engage with Your Local Registry/Registrar**
    a. Reasons and benefits of engagement
    b. Questions to a panel with parallel audience polling

Time permitting, additional items for the GAC's consideration are:

3. **DNS Abuse Mitigation**
    a. Motivations to Mitigate DNS Abuse from a RrSG perspective
    b. Charter Drafting and the Role of the GAC Liaison
4. **SSAD SRT / LEA Authentication**
    a. GAC views on the current SSAD recommendations and whether they address GAC needs
    b. GAC perspectives on the direction of the LEA Authentication Input Group, including engagement beyond PSWG participation and any emerging concerns or considerations

Background and Recent Development on the Proposed Agenda Items

Next Round and NTAG

Following Reveal Day on 7 October, GAC members will begin reviewing published applications and considering any potential public policy concerns. The CPH will introduce the New TLD Applicant Group (NTAG) as a resource for engagement with applicants and discuss the value of early communication between governments and applicants, including where concerns may lead to a GAC Early Warning.

How to Engage with your local registry/registrar

This agenda item will explore the value of engagement between GAC members and local registry and registrar operators, including the potential benefits of building stronger relationships and channels of communication. The session will feature an interactive discussion on practical approaches to engagement, supported by questions to a panel and audience polling.

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
        - Suggested that reviewing evidence from ccTLDs showing the effectiveness of more stringent verification requirements than the 15-day verification timeline to mitigate DNS Abuse would be useful

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

- 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.

Urgent Request and ICANN org's Input Group on Law Enforcement Agency Authentication Mechanisms

- On 12 May 2026. ICANN published the updated Registration Data Policy as part of ICANN Consensus Policies to include the 24-hour expedited response timeline for Urgent Requests, noting that the effective date for this requirement will be determined following finalization of the authentication mechanism for requestors.
- An ICANN org led Input Group was recently charted to develop "*a proof of concept for an operationally effective approach to authenticating law enforcement agents who submit requests through the Registration Data Request Service (RDRS) or its successor system.*" which is expected to enable the Urgent Request part of the Registration Data Policy to become effective (Implementation Note K: *The obligations under Section 10.7 will become effective on the date that ICANN fully implements a Consensus Policy that establishes a process for authentication of a requestor*)
- As it relates to Authentication of Law Enforcement Requestors for Urgent Requests, the SSAD SRT is expected by the GNSO Council to address the EPDP Phase 1 Rec. 18 policy gap regarding the "authentication" part of the solution for timely response to Urgent Request (letter from the GNSO Council chair 29 April 2026, and related Board acknowledgement, 13 May 2026)

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