ICANN | GAC
Governmental Advisory Committee

ICANN 87 ANNUAL GENERAL MEETING

Opening Plenary

Session 1

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Session Agenda

- Welcome remarks from the GAC Chair.
- Welcome remarks from the host government.
- High-level overview of the GAC agenda and priority issues for ICANN87.
- Brief acknowledgement of the AGM and GAC leadership transition.
- Tour de table introductions by GAC Members and Observers.
- Meeting logistics and participation reminders.

Session Objective

The GAC Opening Plenary Session is the first formal opportunity for GAC participants to gather at ICANN87, introduce themselves and prepare for the meeting week.

During the session, the GAC Chair will welcome in-person and remote participants, provide a high-level overview of the GAC agenda, highlight key substantive and operational priorities for the week, and share important meeting logistics.

As is customary, a representative of the host government, Indonesia, will also offer brief welcoming remarks.

Leadership Proposal for GAC Action

n/a

Session Outline

ICANN87 takes place at an important stage of the 2026 New gTLD Program. The application process is now operational and the GAC is finalizing its own operational readiness to engage in the mechanisms available to governments during the application process.

[If Reveal Day has occurred before ICANN87:] With Reveal Day having taken place, GAC Members and Observers will have begun reviewing the application set ahead of and during ICANN87. The GAC's consideration of possible Early Warnings is expected to be one of the first major areas requiring coordinated engagement. At the same time, applicants may be considering whether to exercise available replacement-string options. GAC discussions during the week are therefore expected to include both replacement strings and initial consideration of possible Early Warnings.

[If Reveal Day has not yet occurred:] With Reveal Day expected shortly after ICANN87, the meeting will provide an important opportunity for GAC Members and Observers to complete preparations for reviewing the application set and considering possible Early Warnings. Discussions during the week are also expected to address the replacement-string process and its relevance to subsequent GAC review.

Other substantive and operational priorities expected to feature during the week include:

- DNS Abuse mitigation.
- Registration Data issues.
- Review of Reviews.
- GAC operational matters, including ongoing work related to continuous improvement and internal procedures.
- Engagement with the ICANN Board and other ICANN Supporting Organizations, Advisory Committees and stakeholder groups, including the GNSO Council, ccNSO, Contracted Parties House (CPH) and Commercial Stakeholder Group (CSG).

Finally, ICANN87 is an Annual General Meeting and marks an important transition for the GAC. It will be the final GAC public meeting chaired by GAC Chair Nicolas Caballero, who has served in the role since March 2023. Ian Sheldon is due to assume the role of GAC Chair at the close of ICANN87. The meeting will also complete the broader GAC leadership transition, including the process to fill the Vice-Chair vacancy resulting from Ian Sheldon's move from Vice-Chair to Chair.

Tour de Table

As part of the traditional opening session, GAC Members and Observers will be invited to introduce themselves. In-person participants will be invited to introduce themselves first, followed by remote participants.

Time permitting, participants may also be invited to briefly identify any particular expectations or priorities for the meeting.

Further Information

GAC Support Staff will provide brief reminders on meeting participation, including the use of Zoom, interpretation and transcription services, access to session materials, and other relevant logistical arrangements for ICANN87.

GAC Members and Observers are also reminded of the GAC Gala, organized by the Indonesian host, which will take place on Tuesday, 20 October 2026. Participants who have not yet registered should contact the GAC Support Team for assistance with the invitation and additional logistical information.

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ICANN 87 ANNUAL GENERAL MEETING

GAC Capacity Development Sessions

Session 2 and 3

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Session Objective

As part of ongoing efforts to support the GAC's preparedness for the New gTLD Program: 2026 Round, the Capacity Development Sessions (CDS) at ICANN87 will build on previous GAC capacity development activities and provide members with updated information on the application and evaluation processes, key program milestones, and the mechanisms available for community and GAC input.

The sessions will also introduce GAC members to the operational arrangements being developed to support GAC engagement in the 2026 Round. Following Reveal Day on 7 October, Members will receive an overview of the GAC's approach to reviewing published application information and the supporting readiness materials, ahead of their more detailed consideration during the subsequent GAC plenary sessions. Through informational updates and interactive discussion, the sessions aim to strengthen Members' preparedness for future stages of the process, including GAC Early Warnings, possible GAC Advice, and other opportunities for GAC engagement.

The sessions are also intended to facilitate experience-sharing among GAC members regarding their perspectives and experiences with the new gTLD application process, while bringing in an applicant perspective to help members better understand why an organization may decide to apply for a new gTLD and the considerations involved in preparing an application.

Leadership Proposal for GAC Action

1. GAC Members to receive an updated overview of the New gTLD Program: 2026 Round, building on the capacity development provided at ICANN86, including the current program status and timeline, the outcome of Reveal Day and subsequent milestones, application

procedures and evaluations, and mechanisms for community and GAC input.

2. GAC Members to exchange experiences and gain practical insight into preparing for and engaging in the 2026 Round, including perspectives on the new gTLD application process.

3. GAC Members to gain an overview of the GAC's operational readiness for the 2026 Round, including the proposed application review process and timeline, the Operational Readiness Framework, the different pathways available to GAC Members, and how the various readiness materials fit together.

Current Status and Recent Developments

GAC capacity development sessions (CDS) provide an opportunity for GAC members to learn the basics or deepen their knowledge of aspects of the ICANN multistakeholder model, its structure, and operations. They also provide 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.

Since 2025, GAC capacity development activities have primarily focused on the New gTLD Program: 2026 Round, with the aim of strengthening members' understanding of the relevant processes and supporting their preparedness for GAC engagement in the Round. As the Round now moves into the application processing phase, several key milestones are taking place in the lead-up to and following ICANN87.

On 22 September, ICANN confirmed that 1,616 applications will proceed in the 2026 Round. Reveal Day will take place on 7 October 2026, when ICANN will publish applicant information, applied-for primary strings and any applicable variant or replacement strings, initial contention sets, and the public portions of applications through the 2026 Round Application Publication and Statistics website. This will be followed by the Replacement Period from 8 to 21 October, during which applicants may switch to an eligible replacement string included in their application. String Confirmation Day is scheduled for 17 November 2026, when final applied-for strings and updated contention sets will be published by ICANN and Community Input and Objections Period will begin, running through 16 March 2027.

In preparation for ICANN87, GAC Support coordinated with the GAC Capacity Development Working Group, GAC Topic Leads, and the ICANN org Next Round team to develop a progressive approach in which the capacity development and GAC plenary sessions complement one another:

- **Capacity Development Session 1 (CDS1):** focused on the status of the 2026 Round following Reveal Day, application processing, key upcoming milestones, and opportunities for community and GAC input; and
- **Capacity Development Session 2 (CDS2):** focused on the GAC's operational readiness for the review of applications and the supporting readiness materials.

This approach reflects input received from GAC Leadership, the GAC Capacity Development Working Group, and Topic Leads regarding the value of practical discussions and opportunities to explore differing perspectives and levels of preparedness among GAC members.

ICANN87 Capacity Development Sessions

Capacity Development Session 1
New gTLD Program Next Round: Understanding the 2026 Round

This session will begin with an updated status overview of the 2026 Round of the New gTLD Program, building on the capacity development provided at ICANN86 and reflecting developments following Reveal Day on 7 October, including application publication, the ongoing Replacement Period, and key milestones leading to String Confirmation Day.

It will then review the key stages of the application and evaluation processes and the opportunities available for community and GAC input, including Application Comments, GAC Early Warnings, possible GAC Advice, objections, and appeals.

The session will also highlight relevant ICANN resources and systems and include interactive elements, such as polls and examples, to support understanding of the practical implications for governments and GAC members and allow ample time for discussion and questions.

The session will also include an applicant perspective on the new gTLD application process.

Capacity Development Session 2
2026 New gTLD Program Next Round: GAC Role and Operational Readiness

This session will introduce the GAC's operational readiness approach for the 2026 Round and provide an overview of how the GAC is preparing to review application information published on Reveal Day and engage in the subsequent stages of the process.

GAC Topic Leads, Leadership, and Support will introduce the Operational Readiness Framework, its overall purpose and structure, and the supporting readiness materials developed to assist GAC Members and Observers in preparing for their engagement in the application review process.

More detailed consideration of the operational approaches and supporting materials, including GAC Early Warnings and possible GAC Advice, will take place during the subsequent plenary sessions.

Key Reference Documents

- ICANN87 Plenary Session on New gTLDs Next Round
  [note: Until the session has taken place, the briefing will be published for GAC members' access only]
- New gTLD Program website
- ICANN Policy Development Accelerator workspace

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GAC Discussion on New gTLD Program Next Round

Sessions 4, 6, 11

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Session Objective

GAC Members will continue preparations for engagement in the New gTLD Program: 2026 Round, building on the Capacity Development Sessions taking place at ICANN87 immediately preceding these plenary sessions and on intersessional work undertaken by GAC Leadership, Topic Leads and GAC Support to support GAC readiness for the 2026 Round.

The sessions will focus on the applications published on Reveal Day and the confirmed upcoming milestones in the New gTLD Program: 2026 Round, including the Replacement Period and String Confirmation Day, and developments related to the Applicant Support Program (ASP).

A particular focus will be placed on GAC operational readiness for the forthcoming stages of the 2026 Round. GAC Members will review the Operational Readiness Framework updated to reflect the confirmed 2026 Round milestones, together with the operational approaches and supporting materials prepared for specific GAC mechanisms, including GAC Early Warnings and the consideration of possible GAC Advice concerning applied-for strings.

The sessions will also provide an opportunity for GAC Members to exchange initial observations on the applications published on Reveal Day, including any applicable replacement strings, identify potential public policy issues that may warrant further consideration, and consider any additional coordination, guidance or support that may be required.

Leadership Proposal for GAC Action

1. GAC Members to receive updates from ICANN org regarding the applications published on Reveal Day, the Replacement Period, confirmed upcoming milestones, and developments related to the Applicant Support Program (ASP).

2. GAC Members to review the Operational Readiness Framework and related operational approaches and supporting materials developed to support timely and effective GAC engagement throughout the forthcoming stages of the 2026 Round, building on the ICANN87 Capacity Development Sessions.

3. GAC Members to consider practical arrangements for engagement in upcoming processes, including GAC Early Warnings and the consideration of possible GAC Advice concerning applied-for strings, and identify any additional coordination, guidance or support needs.

4. GAC Members to exchange initial observations on the published applications, including any applicable replacement strings, identify potential public policy issues that may warrant further consideration, and identify matters that may benefit from further GAC discussion, coordination or other follow-up.

Current Status and Recent Developments

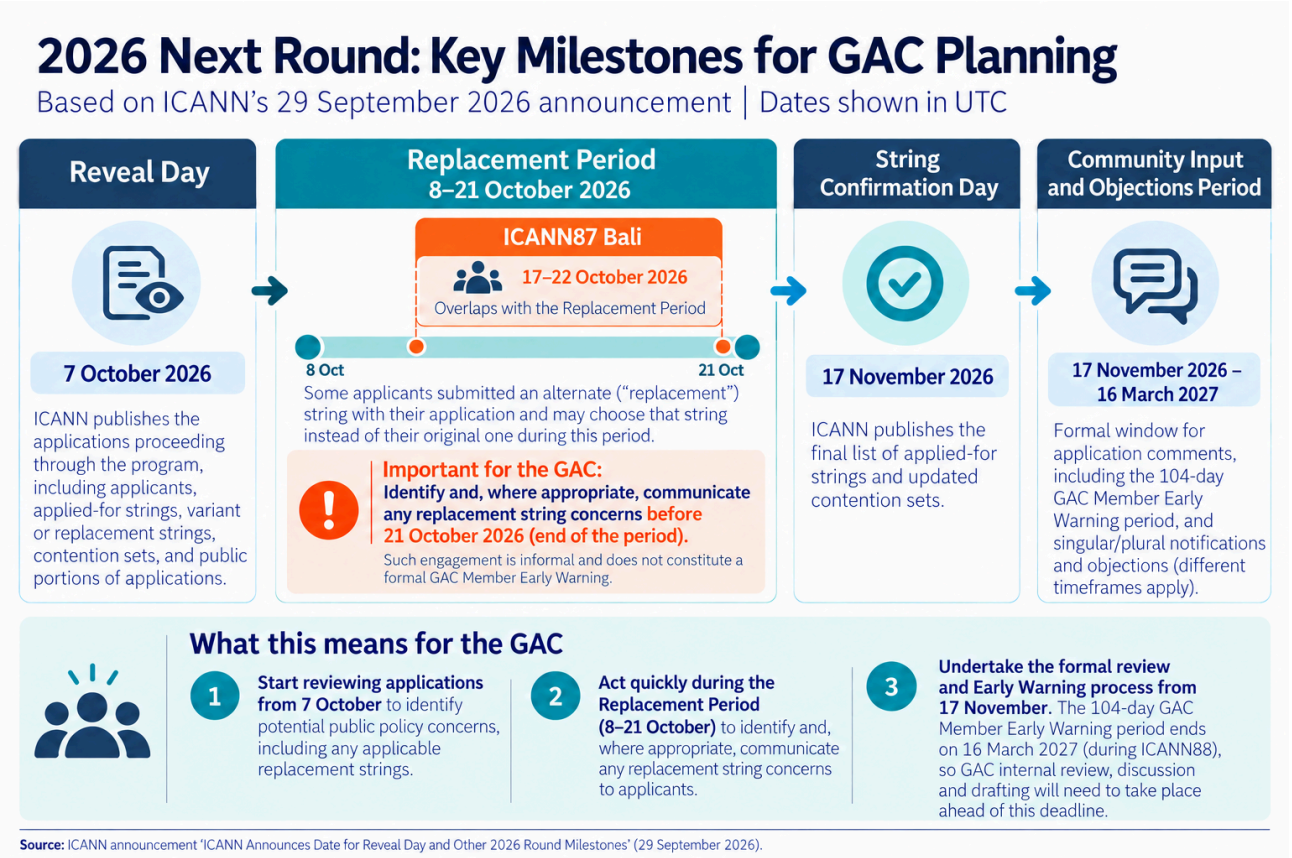
New gTLD Program: 2026 Round – Status Update

The application submission period for the New gTLD Program: 2026 Round closed on 12 August 2026 with 1,663 submitted applications. At the close of the application window, ICANN reported that more than 1,100 applications included replacement strings. On 22 September, ICANN confirmed that 1,616 applications will proceed in the 2026 Round, representing applications for which the required evaluation fee has been received.

Reveal Day will take place on 7 October 2026. ICANN will publish the applications proceeding through the Program, including applicant information, applied-for primary strings and any applicable variant or replacement strings, initial contention sets, and the public portions of applications. The information will be made available through the 2026 Round Application Publication and Statistics website.

Forthcoming Stages of Relevance to GAC Members

The next stages of the 2026 Round include several processes of particular relevance to governments and GAC Members and Observers.



Following Reveal Day on 7 October 2026, GAC Members and Observers will be able to begin reviewing the published applications, including applied-for strings, any applicable replacement strings, initial contention sets and the public portions of applications.

The Replacement Period (8–21 October) will overlap with ICANN87, providing an opportunity for preliminary review and discussion while eligible applicants may still elect to use a replacement string. The final list of applied-for strings and updated contention sets will be published on String Confirmation Day, 17 November 2026.

String Confirmation Day will also open the Community Input and Objections Period, running through 16 March 2027, including the 104-day GAC Member Early Warning period. Other available mechanisms include application comments, Singular/Plural Notifications, objections under the Applicant Guidebook, and GAC Consensus Advice.

The Prioritization Draw will take place on a date to be determined in the first half of 2027, following completion of the String Evaluation Stage.

These forthcoming processes are reflected in the GAC's operational readiness work described below.

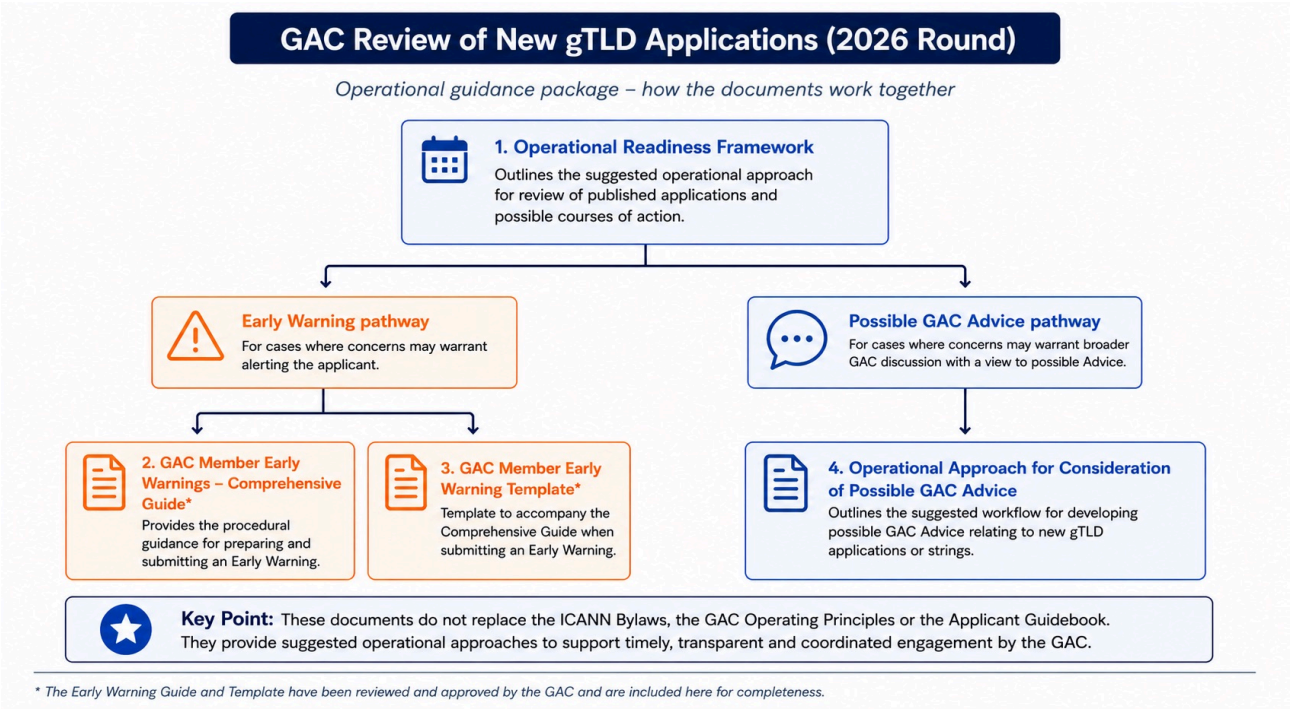
GAC Operational Readiness for the 2026 Round

Building on GAC discussions at ICANN86 and subsequent intersessional work, GAC Leadership, Topic Leads and GAC Support have developed an Operational Readiness Framework to support timely, coordinated and effective GAC engagement throughout the forthcoming stages of the New gTLD Program: 2026 Round.

The Framework provides an overarching structure for GAC preparedness across the stages of the application process in which individual GAC Members and Observers or the GAC collectively may need to engage. It is intended to anticipate operational requirements, clarify relevant roles and processes, and ensure that appropriate arrangements and supporting materials are in place as each stage of the Round is reached.

Following confirmation of the 2026 Round milestones, the Framework has been updated to distinguish between the initial review of published applications following Reveal Day and the review of confirmed strings following String Confirmation Day. It also reflects the specific operational implications of the 8–21 October Replacement Period and the 17 November 2026–16 March 2027 GAC Member Early Warning period.

The operational guidance package, illustrated below, brings together the overarching Framework and supporting materials developed for GAC Early Warnings and the consideration of possible GAC Advice concerning new gTLD applications or strings.



Operational Approaches and Supporting Materials

The Operational Readiness Framework is supported by materials addressing GAC Early Warnings and the consideration of possible GAC Advice concerning applied-for strings, reflecting the different roles of individual GAC Members and Observers and of the GAC collectively.

For GAC Early Warnings, the package includes the GAC Member Early Warnings – Comprehensive Guide and Early Warning Template, which have been reviewed and approved by the GAC. These materials provide procedural guidance to support Members and Observers in preparing and submitting Early Warnings.

For possible GAC Advice, the Operational Approach for Consideration of Possible GAC Advice outlines a suggested workflow to support the identification and collective consideration of issues relating to new gTLD applications or strings that may warrant broader GAC discussion.

The operational guidance package is intended to support timely, transparent and coordinated GAC engagement while preserving the GAC's established procedures and the member-driven nature of GAC processes.

Consideration of Applied-for Strings and Public Policy Issues

Reveal Day on 7 October will allow GAC Members and Observers to begin reviewing the published applications ahead of ICANN87, including any applicable replacement strings.

ICANN87 will overlap with the final days of the Replacement Period, which closes on 21 October. The plenary sessions will therefore provide an opportunity for Members to exchange preliminary observations on the published applications, identify potential public policy concerns, and highlight applications or strings that may warrant further consideration.

Where a concern relates to a replacement string, a GAC Member or Observer may, where appropriate, communicate that concern directly to the relevant applicant before the Replacement Period closes. Such engagement is informal and does not constitute a GAC Member Early Warning.

Discussions during ICANN87 should be understood as preliminary, as the final list of applied-for strings will not be published until String Confirmation Day on 17 November. Such discussions will not prejudge the use of any particular community input mechanism or the development of possible GAC Consensus Advice.

Following String Confirmation Day, Members and Observers will be able to confirm whether issues identified during their preliminary review remain applicable to the final applications and strings and continue their substantive review during the formal Community Input and Objections Period.

The 104-day GAC Member Early Warning period will run through 16 March 2027, during ICANN88 in Lisbon (13–18 March 2027). The opening days of ICANN88 may therefore provide an additional

opportunity for review and discussion where useful, although Members considering an Early Warning should undertake the necessary internal review and drafting sufficiently in advance of the deadline.

The sessions will also provide an opportunity to identify cross-cutting issues emerging from the applications and consider whether further GAC discussion, coordination or operational support may be beneficial.

Applicant Support Program

The Applicant Support Program (ASP) was established to reduce financial and non-financial barriers for eligible applicants from underserved regions and communities seeking to participate in the New gTLD Program: 2026 Round.

The ASP evaluation phase concluded in August 2026. ICANN reported that, of 78 ASP applications received, 56 applicants qualified for support. Three applicants did not qualify, four applications were withdrawn, and 15 applications were terminated because they remained incomplete when the ASP application system closed.

The 56 qualified supported applicants represent a substantial increase in participation compared with the 2012 Round, and exceeded ICANN's original planning assumption of 40–45 supported applicants. Qualified supported applicants have access to financial and non-financial assistance intended to facilitate participation in the 2026 Round.

The GAC has closely followed the development and implementation of the ASP and has previously expressed interest regarding its effectiveness and accessibility, including through exchanges with the ICANN Board and collaboration with ALAC. This interest was reflected in the ICANN86 briefing and discussions.

At ICANN86, the GAC discussed the level of financial support available to qualified supported applicants. Following consideration of a potential increase in the evaluation fee reduction from 75% to 85%, the ICANN Board decided in May 2026 not to take further action on the proposal. The evaluation fee reduction for qualified supported applicants therefore remains 75%.

ICANN87 provides an opportunity for GAC Members to receive an update from ICANN org on the outcome of the ASP and implementation of support for qualified applicants.

Applicant Guidebook and Supporting Materials

The New gTLD Program: 2026 Round Applicant Guidebook remains the authoritative source for the requirements and processes governing applications in the Round. Following the ICANN Board's adoption of the Applicant Guidebook at ICANN84 and publication of Version 1 on 16 December

2025, ICANN published an updated version on 24 April 2026 (V2-2026.04.24) incorporating minor revisions. The latest English version is the authoritative version of the Applicant Guidebook.

ICANN org continues to maintain complementary resources, including Key Topic Overviews, Frequently Asked Questions and other materials intended to assist applicants and the wider community in navigating the application and evaluation processes. The ICANN86 briefing identified these resources, including those concerning geographic names, objections and appeals, and GAC Early Warnings and Advice.

Resources of particular relevance to GAC Members as the Round progresses include materials addressing GAC Early Warnings and GAC Consensus Advice, geographic names, application comments, objections and appeals, and other mechanisms for community input.

GAC-specific materials developed to support engagement in the 2026 Round include the GAC Workbook: 2026 Round Community Input Actions, the Projected Timeline for GAC Community Input Actions, and the operational readiness materials developed in preparation for the forthcoming stages of the Round.

Key Reference Documents

- New gTLD Program: 2026 Round Applicant Guidebook
- 2026 Round: Key Milestones for GAC Planning (October 2026)
- GAC Review of New gTLD Applications (2026 Round): Operational Readiness Framework
- GAC Member Early Warnings – Comprehensive Guide
- GAC Member Early Warning Template
- Operational Approach for Consideration of Possible GAC Advice
- ICANN Confirms Number of Applications Proceeding in the 2026 Round (22 September 2026)
- ICANN Announces Date for Reveal Day and Other 2026 Round Milestones (29 September 2026)
- GAC Member Early Warnings and GAC Consensus Advice Topic Overview
- New gTLD Program: 2026 Round Resources Page
- GAC Workbook: 2026 Round Community Input Actions (March 2026)

Further Information

- GAC Policy Background Document on Subsequent Rounds of New gTLDs

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ICANN 87 ANNUAL GENERAL MEETING

ICANN87 GAC Session Briefing – Universal Acceptance Discussions

Session 5

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Background

Established during the ICANN66 Public Meeting in Montreal, the GAC's Universal Acceptance and Internationalized Domain Names Working Group (UA-IDN WG) helps the Committee track, consider, and address matters and topics relevant to governments in these areas. The GAC Leadership looks to the Working Group to provide perspectives, information, and expertise on Universal Acceptance (UA) and IDN matters when they arise in various contexts.

IDNs enable domain names to be used in languages and scripts beyond the basic Latin alphabet. UA, while closely related, is a broader technical requirement: it helps ensure that all valid domain names and email addresses, including internationalized ones, are accepted, validated, stored, processed, and displayed correctly by Internet-enabled applications and systems.

Over recent years, ICANN org and the community have undertaken significant awareness-raising and technical work on UA. The focus is increasingly shifting from awareness and guidance toward adoption and practical implementation. For governments, this raises an important question: how can public policy, procurement, national digital strategies, and digital government services help accelerate UA adoption.

Recent developments include WSIS+20 Outcome document (item 28) calling for IDN and UA support, UNESCO delineating the role of stakeholders in promoting UA adoption in its UA Policy Brief, and the publication of the Guidelines for Advancing UA Adoption, developed by the UA Expert Working Group organized by ICANN. These resources identify the public sector and governments among the key stakeholder groups for implementation, alongside large technology organizations and open-source communities. ICANN org is now reviewing and prioritizing the resulting actions and coordinating implementation across relevant functions.

The GAC UA-IDN WG is also calling on governments to express their interest in becoming UA Champions and to contribute to advancing UA adoption within their respective national contexts. The initiative provides an opportunity for interested governments to share their experiences, initiatives, and challenges, raise awareness of UA, and encourage its consideration in relevant

government policies, digital services, procurement, and digital transformation efforts. The call for governments to express their interest remains open, providing an opportunity for broader government participation and engagement.

Session Objective

The primary objective of the ICANN87 session on Saturday 17 October is to begin a practical GAC discussion on why UA adoption matters for governments and how governments can help advance it domestically.

The session will consider how governments can use policy, procurement, digital strategies, and public-sector services to support adoption, while also identifying areas where additional guidance, resources, or coordination may be useful.

The session will also provide an opportunity for governments to **express their interest in becoming UA Champions**, supporting the initiative by raising awareness of UA and encouraging its consideration within relevant national policies, digital services, procurement practices, and digital transformation efforts. The call for governments to join the UA Champion initiative will remain open to encourage broader government participation and engagement.

The session will also highlight opportunities for governments to demonstrate leadership on UA implementation, including through the GAC UA-IDN Working Group's UA Champion initiative, which encourages governments to promote UA within their jurisdictions and support practical implementation through national digital strategies, policies, public procurement, and digital government services.

To support the discussions, the session will provide targeted updates on recent UA developments, including UA Day activities, ICANN's collaboration with UNESCO and the UNESCO-ICANN Policy Brief, and the work of the UA Expert Working Group. A government case study will offer a practical example of implementation. Relevant IDN developments will be addressed where they directly relate to UA adoption and government implementation.

- Updates on UA:
    - UA-Day 2026 and related community activities
    - UNESCO-ICANN Collaboration and Policy Brief on Advancing Universal Acceptance for a Multilingual Internet.

- UA Expert Working Group Updates and Government Role
    - Guidelines for Advancing UA Adoption
    - Prioritization of public sector and government implementation
    - Transition from guideline development to implementation planning

- Government Showcase / Case Study on Advancing Universal Acceptance
    - Practical government experience in advancing UA and/or IDN readiness
    - Lessons learned and opportunities for broader application

    - UA Champion initiative and call for interested governments to express their interest in becoming UA Champions

- Interactive GAC Discussion:
    - What experiences, challenges, and implementation opportunities have governments identified in advancing Universal Acceptance?
    - In what areas would further guidance, resources, or coordination be most useful to support government UA implementation?
    - Why should Universal Acceptance be considered a policy priority for governments, and what are the risks of delaying UA adoption at the national level?
    - How can governments integrate UA requirements into national digital strategies, e-government platforms, and procurement policies?
    - What role should GAC play in ensuring UA considerations are reflected in ICANN policy development and advice?

- Priorities and Next Steps
    - Possible priorities for the GAC UA-IDN Working Group, with a focus on supporting government UA adoption
    - Opportunities for continued government engagement, implementation support, and collaboration
    - Supporting the UA Champion initiative, including continued communication and coordination with the ICANN UA team, UNESCO, and governments that have expressed or may express interest in becoming UA Champions
    - Identifying practical next steps and mechanisms for ongoing engagement among interested governments, the GAC UA-IDN WG, ICANN, and UNESCO

Key Reference Documents

- UA Champion Call
- GAC UA-IDN Working Group Web Page
- GAC Annual Plan 2025/2026
- Guidelines for Advancing UA Adoption
- UA IDN Implementation / Adoption Report - 2026
- UA Day 2026 Report
- UNESCO UA Policy Brief

- WSIS+20 Outcome Document (item 28)
- ITU PP Resolution 133

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ICANN 87 ANNUAL GENERAL MEETING

Registration Data Issues

Session 7

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GAC Plenary Session Objective

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

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

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

Leadership Proposal for GAC Action

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

2. **Consider proposed modifications to the 2020 policy recommendations for a System for Standardized Access/Disclosure (SSAD)** in an expected Public Comment proceeding after ICANN87, on outputs of the GNSO SSAD Supplemental Recommendations Team (SRT), in light of:

    a. GAC Comments (29 Sept. 2025) on the RDRS Standing Committee Report (19 August 2025) including the GAC recognition "*that the original package of EPDP Phase 2 recommendations may benefit from revision in light of RDRS findings [...]*" but concerns "*that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations [...]*"

    b. The ICANN Board resolution (30 October 2025) on the continuation of the RDRS for up to 2 years "while the community continues its deliberations regarding the future of the service and related policy recommendations", urging "*the GNSO Council to ensure that future policy work on the System for Standardized Access/Disclosure (SSAD) recommendations is aligned with policies related to requests for underlying registration data for domains registered under privacy and proxy services, an enforceable timeline for urgent requests, and other relevant procedures*."

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

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

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

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

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

    d. The assignment of the SSAD Supplemental Recommendations Team

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

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

Current Status and Recent Developments

This section is subdivided to address the following topics

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

- **The Registration Data Request Service (RDRS),** which launched on 28 November 2023 as a **proof of concept or pilot program** aimed to "*simplify the process for submitting and receiving requests for nonpublic gTLD registration data for both the requestors and contracted parties"* and to inform further consultations on the feasibility of a permanent System for Standardized Access/Disclosure of Registration Data (SSAD). The RDRS has enabled the collection and reporting on more than 2 years of usage data[1]**. The GAC has consistently called "for measures to ensure the ultimate result is progress toward the ICANN Board's previously expressed goals, including making RDRS participation mandatory for all gTLD registrar** and continuing RDRS operation past its pilot period "until missing policy elements are in place"

    - In the ICANN82 GAC Seattle Communiqué (17 March 2025), **the GAC** expressed the view that there is "*substantial room for the RDRS to generate additional value, including for requestor communities, especially if the system can be adequately enhanced based on users' feedback and usage metric reports.*"
      The GAC recalled its recommendations that RDRS participation be made mandatory for all gTLD registrars; that the system should provide underlying data for privacy and proxy registrations; that the RDRS should incorporate APIs to better facilitate RDRS usage by requestors and registrars and to make it ready to incorporate future authentication solutions for law enforcement; and invited the ICANN Board and the ccNSO to explore ways to overcome the existing challenges to allow the voluntary participation of ccTLDs in the system.

    - In the ICANN83 GAC Prague Communiqué (16 June 2025), the GAC The GAC expressed its "***concerns regarding the reduced use of the tool in light of the departure of certain registrars from the pilot and reiterates its recommendation that RDRS participation should be made mandatory*** *for all gTLD registrars to increase its utility*". The GAC renewed "*its call for the RDRS to continue operating beyond its pilot period and for enhancements to be made to the RDRS as previously identified by both the ICANN Board and the GAC*". The GAC also welcomed "*the Board's comment during ICANN83 that ICANN is developing an analysis of which envisioned enhancements to the RDRS would require new policy development and which ones could be completed based on existing recommendations or policies.*"

    - In response to the Public Comment proceeding on the RDRS Standing Committee Report (19 August 2025), the GAC submitted Comments (29 Sept. 2025) in **support of most of the RDRS Standing Committee recommendations to the GNSO Council**, including:
        - Rec. 1: Continue the RDRS beyond the pilot period.
        - Rec. 2: Allow for authentication of interested requestor groups, beginning with law enforcement.

[1] See monthly Registration Data Request Service Usage Metrics since the launch of the service, available at https://www.icann.org/rdrs-en. Since November 2024, ICANN org has started reporting on two new metrics which provide a breakdown of disclosure requests by country or processing jurisdiction and by requestor type, see for instance p.26 and p.31 of the February 2025 RDRS Usage Metrics Report.

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

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

- **Feasibility of a permanent System for Standardized Access/Disclosure of Registration Data (SSAD) has been focusing on assessing the operations of the Registration Data Request Service (RDRS)**, following the GNSO's request for an SSAD proof of concept (27 April 2022) on the basis of an ICANN org Design Paper (13 Sep. 2022) and consistent with updates (7 Nov. 2022) suggested by the GNSO Council to the ICANN Board (17 Nov. 2022). **The GNSO Council has now started**, following the "non-adoption" the ICANN Board of the original GNSO EPDP Phase 2 SSAD Recommendations, **to deliberate on modification of the original SSAD recommendations**, consistent with Recommendations from the GNSO RDRS Standing Committee (10 November 2025) and ICANN org's RDRS Policy Alignment Analysis (30 October 2025), as urged to so by the ICANN Board (30 October 2025).
    - The GNSO resolution on the EPDP Phase 2 Final Report (24 September 2020) **adopted the 18 recommendations that seek to establish an SSAD**, **requesting a consultation with the ICANN Board** prior to its consideration of the policy recommendations **to discuss "*questions surrounding the financial sustainability of SSAD and some of the concerns expressed within the different minority statements*"** including in the GAC Minority Statement (24 August 2020).
    - Prior to considering the GNSO's SSAD Policy Recommendations, **the ICANN Board** launched (25 March 2021) an **Operational Design Phase (ODP)** to perform an assessment of possible implementation parameters. A GNSO Small Team reviewed ICANN org's resulting Operational Design Assessment (25 Jan. 2022) in support of the GNSO Council's consultation with the ICANN Board and consideration of questions and concerns expressed in a Board letter (24 Jan. 2022).
    - In a letter to the ICANN Board (27 April 2022), **the GNSO shared concerns with ICANN's Operational Design Assessment** and called for a pause of the Board's consideration of the SSAD recommendations to allow for work to continue on a "proof of concept", in collaboration with ICANN org, who suggested it could propose a simplified "SSAD Light Design" in a Concept Paper (6 April 2022)[2]. The **ICANN Board** confirmed (9 June 2022) its **agreement and decision to pause the consideration of the policy recommendations**.
    - In the The Hague Communiqué (20 June 2022), while looking forward to the "*timely completion of the 'proof of concept'*", the GAC emphasized "*the importance of providing specific timelines and goals"* for this work and clarifying "*what will happen after the 'proof of concept' phase concludes*".
    - The **GNSO Council** adopted the addendum (7 Nov. 2022) to the SSAD ODA Small Team Preliminary Report (4 April 2022) and expressed being "***supportive of the request that the ICANN Board proceeds with the implementation of the Whois Disclosure System***" in the GNSO Chair letter to ICANN Board Chair (17 Nov. 2022) consistent with ICANN org's WHOIS Disclosure System Design Paper (13 Sep. 2022)

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

- On 27 February 2023, the ICANN Board resolved to **launch the implementation of the WHOIS Disclosure System, or "Registration Data Request Service"** per the associated announcement (2 March 2023).
- In the Washington D.C. Communiqué (20 June 2023), **the GAC noted "*the importance of maximizing voluntary participation in the system, including through effective outreach and potential incentive structures*"** and stressed "*the importance of providing users of the RDRS with easy to access step-by-step training, and guidance*".
- In the ICANN Board Comments on the Issues of Importance in the Washington D.C. Communiqué (18 September 2023), **the ICANN Board shared "*the same sentiment as the GAC on the importance of maximizing the participation of the users, both from ICANN-accredited registrars and requestors*"**. It noted "*that ICANN org has been conducting its various engagement and outreach efforts and will continue to do so up until and beyond the launch of the service".*
- In the GAC Hamburg Communiqué (30 October 2023), **the GAC recalled that the ICANN Board "*urged the GNSO Council to consider a Policy Development Process or other means to require registrars to use the RDRS*"**[3] and reaffirmed that the GAC "*remains supportive of this idea*". Observing that "*the RDRS's success depends in part on how satisfied users are with the system*", **the GAC stressed that a success factor will be "*whether users submitting legitimate requests receive data relating to the underlying registrant as opposed to information related to a privacy or proxy service*"**, a risk noted by ICANN in its Operational Design Assessment of the SSAD[4].
- In the GAC San Juan Communiqué (11 March 2024), the GAC reiterated that "***widespread use of the pilot by both registrars and requesters will help the RDRS meet its intended purpose***" and stated "*[t]he GAC believes* ***all contracted registrars should participate****.*", encouraging "*ICANN org to* ***conduct a survey of registrars who are not currently participating in the RDRS*** *to gain insights into the concerns of these parties and potential challenges that could be addressed*". Stressing "*the* ***importance of continued outreach efforts throughout the lifespan of the RDRS*** *to ensure both requesters and registrars are aware of the uses and limits of this pilot program as well as its intended purpose*", the GAC highlighted "*potential improvements that could help the pilot meet its intended purpose and create an improved user experience"* such as "*unnecessary and confusing elements of the current requester interface, particularly with respect to requests from law enforcement and the applicability of various data protection frameworks".*
- In the GAC Kigali Commununiqué (17 June 2024) **the GAC found that "*the usage of the tool could be further increased****, and that the metrics have already shed light on potential improvements that could help the service meet its intended purpose",* recalled that "*several suggestions for improvement were already formulated in the San Juan Communiqué and stands ready to continue its work on the RDRS Standing Committee to address challenges and maximize the utility of the system for both requestors and*

[3] see ICANN Board Resolution on WHOIS Disclosure System Implementation (27 February 2023)
[4] SSAD Operational Design Assessment (25 January 2022) at pp.19-20

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

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

- In response to **Recommendation 5** of the Preliminary RDRS Standing Committee Report (19 August 2025) regarding next steps on EPDP Phase 2/SSAD Policy Recommendations, the GAC Comments (29 Sept. 2025) recognized *"that **the original package of EPDP Phase 2 recommendations may benefit from revision in light of RDRS findings** [...]"* but expressed concerns *"that a blanket rejection of the recommendations may carry unwarranted risk by calling into question the future of all the SSAD-related recommendations [...]"*
- As part of its resolutions (30 October 2025) to continue operations of the RDRS for a period of up to two years, **the ICANN Board also urged the GNSO Council:**
  - **To ensure that future policy work on the SSAD recommendations is aligned with policies related to requests for underlying registration data** for domains registered under privacy and proxy services, an **enforceable timeline for urgent requests**, and other relevant procedures.
  - To consider the RDRS Policy Alignment Analysis (30 October 2025) in its future consultation with the ICANN Board on the EPDP Phase 2 policy recommendations.
- GAC Comments (15 December 2025) on the ICANN org RDRS Policy Alignment Analysis laid out the **GAC expectations**, **that modification of the EPDP Phase 2 SSAD recommendations to achieve the expected improvements shared between the ICANN Board and GAC be done swiftly** and that *"[s]hould the GNSO ultimately not deem it feasible to utilize the policy paths identified within this document to achieve these goals, the GAC would anticipate and support the pursuit of these goals by other means, which could include but may not be limited to new policy development processes or contract amendments*"
- During ICANN85, **the ICANN Board and GNSO Council were expected to take the necessary steps to launch the process** described in the ICANN Bylaws, Annex A, Sec. 9 **which provides for possible modification of GNSO Policy Recommendations** (Supplemental Recommendations). This process was discussed in the GNSO Council in January 2026 and an initial dialogue with members of the ICANN Board took place in the GNSO Council meeting on Thursday 12 February (see Agenda Item 5). Eventually, the ICANN Board resolved to not adopt the original SSAD Recommendations (12 March 2026).
- Prior to ICANN86, the GNSO convened a SSAD Supplemental Recommendations Team (SRT) **including two GAC representatives from the GAC Small Group on Registration Data: David Bedard (Canada) and Owen Fletcher (United States)**. The group is expected, according to its GNSO Council Assignment, to propose modifications to the original 18 SSAD recommendations "based on the recommendation rationale provided in the [RDRS] Standing Committee's Final Findings Report" **by February 2027.**
- **The SSAD SRT** has been meeting several hours every week since before ICANN86 and has gone through several readings of the proposed modified SSAD recommendations before these can be finalized and published for community review after ICANN87. The SRT will

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

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

- **The policy foundation of a new Registration Data Policy regime,** the Registration Data Policy (21 February 2024) became effective on 20 August 2025**, with the exception of provisions related to the timeline for response to Urgent Requests,** for which the Implementation Review Team (IRT) was recently reconvened (see next section on p.11).
    - This Consensus Policy **will become part of ICANN's contractual requirements for Registries and Registrars within 18 months of its adoption** and replace the current Interim Registration Data Policy for gTLD (20 May 2019) which currently requires Contracted Parties to continue to implement measures that are consistent with the Temporary Specification (20 May 2018). **It introduces** changes to existing ICANN Policies which rely on, or relate to Registration Data, including the superseding of the Thick WHOIS transition Policy and revisions of the implementation of the Registration Data Access Protocol (RDAP).
    - **The GAC provided input** at several stages leading to the adoption of this policy:
        - Input to the ICANN Board (24 April 2019) before its consideration of the GNSO Policy Recommendations from EPDP Phase 1, in which the GAC deemed the "*recommendations to be a sufficient basis for the ICANN Community and organization to proceed - with all due urgency - to the completion of a comprehensive WHOIS model covering the entirety of the data processing cycle, from collection to disclosure, including accreditation and authentication, which would restore consistent and timely access to non-public registration data for legitimate third party interests, in compliance with the GDPR and other data protection and privacy laws*".
        - Advice to the ICANN Board in the Montréal Communiqué (6 November 2019), to "*ensure that the current system that requires 'reasonable access' to non-public domain name registration is operating effectively*" (accepted by the ICANN Board on 26 January 2020) and "*to ensure that the ICANN org and the EPDP Phase 1 Implementation Review team generate a detailed work plan identifying an updated realistic schedule to complete its work*", which were the subject of follow up in the GAC Communiqués of ICANN70 , ICANN71, ICANN72 , and ICANN73 and related interactions with the ICANN Board[5].
        - In the latest GAC Comments (21 November 2022), **the GAC expressed public policy concerns with the proposed Draft Registration Data Consensus Policy for gTLD** including: definition and proposed timelines to respond to urgent requests; collection and publication of reseller data; collection/publication of registration information related to legal entities; need for clear standards around implementation and enforcement; and implementation of a partial system resulting in a policy gap. **The GAC recalled these concerns** in the Cancún Communiqué (20 March 2023) and in the Seattle Communiqué (17 March 2025)[6].

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

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

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

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

- ***The Board would be interested in any data the GAC can provide as to experiences of its members*** *in working with contracted parties on requests of an urgent nature, including the channels used and timing for responses provided. [...]*

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

- Following subsequent correspondence from the GNSO Council to the GAC (15 January 2025) and a trilateral call between the GAC, the ICANN Board and the GNSO Council (12 February 2025), an **agreement was reached among the three parties** that**:**
  - **The EPDP Phase 1 IRT would be reconvened** to work on defining an appropriate timeline for response to Urgent Requests
  - **A group of practitioners would be convened by the GAC PWSG Co-Chairs** to work on defining mechanisms to authenticate law enforcement requests.
- On 20 February 2025, **the Practitioners Group on Law Enforcement Authentication**, composed of representatives from the GAC, the GNSO and several law enforcement agencies including Interpol, Europol and the FBI, held its inaugural meeting and met several times since. It is expected to meet generals every two weeks and to report on its progress to the GAC, the ICANN Board and the GNSO Council regularly.
  To date, participants in this group have discussed both a short term and a long term mechanism to provide this authentication for the benefits of Contracted Parties, through existing ICANN systems, the feasibility of which is being considered by ICANN org.
- On 23 April 2025, **the Registration Data Policy Implementation Review Team (IRT) was reconvened**. Considering ICANN Board guidance in an earlier correspondence to the GNSO Council (3 June 2024) that "*the proposed timeline - whether one, two, or three business days - does not appear to be fit for purpose. To respond to truly imminent threats, a much shorter response timeline, i.e., minutes or hours rather than days, would seem to be more appropriate*", ICANN advanced a proposal that Contracted Paries response to Urgent Requests from authenticated law enforcement requestors within 24 hours.
- Shortly before ICANN84, ICANN org published for Public Comment the proposed Consensus Policy language (22 October 2025) **requiring that Contracted Parties respond to the Urgent Request without undue delay, not to exceed 24 hours**, and 72 hours in exceptional circumstances.
- In its Comments (15 December 2025) on this proposal, the GAC recalled the ICANN84 GAC Dublin Communiqué (3 November 2025) which noted that "***the current proposal for a 24-hour timeline to address Urgent Requests, with potential extension to 72 hours in cases of force majeure, is in line with previous positions expressed by the GAC and the ICANN Board***"
- The report of public comments (14 January 2026) did not confirm whether the proposed policy language was final, nor did it determine among several possibilities, what would be the process steps and time frame required by ICANN org to make the envisioned Law Enforcement Authentication Mechanisms available to Contracted Parties, thus enabling the enforcement of the 24 hour response time.
- On 12 May 2026. ICANN published the updated Registration Data Policy as part of ICANN Consensus Policies to include the 24-hour expedited response timeline for Urgent Requests, noting that the effective date for this requirement will be determined following finalization of the authentication mechanism for requestors.

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

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

- **Privacy/Proxy Services Accreditation (PPSAI) Policy Implementation** has returned to the fore in light of emerging challenges with these services, now being provided by default to registrants by many leading registrars[7] and following the reconvening of an Implementation Review Team (IRT) that had been suspended since 2018. According to a recently published Implementation Plan (8 January 2026). It is expected that the IRT prepares and publishes a Draft Consensus Policy and associated Disclosure Frameworks by the end of 2026. It is currently discussing possible accreditation models

  - Since the entry into force of GDPR and ICANN's Temporary Specification in May 2018, the PPSAI Implementation remained on hold with ICANN org planning to "*allocate resources and finalize a timeline to continue the implementation of PPSAI once the implementation of EPDP Phase 1 is finalized and the design criteria of the EPDP Phase 2 SSAD and Whois Disclosure System are sufficiently stable so that org and the community can identify what synergies can be leveraged with these projects and the PPSAI implementation.*".

  - As part of EPDP Phase 1 Implementation, in the so called Recommendation 27 Registration Data Policy Impacts Wave 1.5 Report (23 February 2021), ICANN org conducted **in-depth analysis of the substantial impact of the Registration Data Policy requirements on the PPSAI recommendations**, and invited the GNSO to consider whether updates of the latter are needed.

  - In the GAC Comments (16 November 2022) on the proposed RDAP and Bulk Registration Data Access (BRDA) Contractual Amendments the GAC argued that ***"commercial proxy services"* may need "*their own data element or entity role*" in RDAP responses**, "*in recognition of the purposes of the RDDS system and the evolving domain name industry*" and the need to include "*all entities inherent to the registrar's domain name registration data distribution channel*", when they exist, in RDAP query responses.

  - In the Report of Public Comments (16 December 2022), ICANN org acknowledged the GAC's input, noting that:

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

- *The proposed RDAP Profile enables the publication of data elements of which the reseller is included.*
- *ICANN org will continue to work with the ICANN community to identify how roles and entities are represented in RDDS as part of the policy development process and will work with the contracted parties to update the respective agreements as policies require*
- *Issues specific to privacy and proxy services will be managed via the implementation of privacy proxy policy recommendations*

- In the Cancún Communiqué (20 March 2023) **the GAC advised the ICANN Board:**
  i. *To prioritize the assessment related to the pending RDS-WHOIS2 Review Recommendation R10.1 which called for the Board to monitor the implementation of the PPSAI policy recommendations, and all necessary steps to resume this implementation, consistent with the intent of the GAC's previous advice.*
  ii. *To regularly update the GAC on the status of activities related to privacy and proxy services.*
- This advice was discussed during the Board/GAC Clarification call (11 April 2023) and eventually accepted by the ICANN Board as reported in the Scorecard of Board Action regarding the Cancún Communiqué (15 May 2023) which noted, at it relates to (i), that "*the assessment is in progress within the org*".
- In the meantime, the ICANN Specific Reviews Q1 2023 Quarterly Report (31 March 2023) clarified that "*Recommendation 10.1 aims to provide better data quality and contactability of the underlying contact owner for registrations using affiliated Privacy or Proxy services by requiring registrars to verify and validate the underlying registration data of domain name registrations.*" and stated:
  - *Following further review, the 2013 Registrar Accreditation Agreement (RAA) already includes requirements for registrars to validate and verify registrant contact data of privacy services*.
  - ***ICANN org plans to resume the implementation of Privacy and Proxy Services Accreditation Implementation (PPSAI)**, which will provide additional explicit requirements to verify and validate registrant contact data of both Privacy and Proxy Services, once the EPDP Phase 1 implementation is completed.*[8]
- During **informal meetings of interested stakeholders during ICANN78 and ICANN79**, stakeholders discussed the possible need to reconsider the original GNSO Policy Recommendations (7 December 2015) and the ensuing implementation approach (suspended in 2018) in light of the substantial evolution of data protection law, industry practices and tools. To this end ICANN org presented further analysis assessing the PPSAI policy recommendations according to an estimated difficulty or level of effort (2 March 2024).

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

- Since the call for volunteers (20 May 2024) to reconvene an Implementation Review Team to assist ICANN is assessing the path forward. This work resulted in the formulation and discussion of an Accreditation Models Paper (12 May 2025) and "threshold questions" and requests for guidance from the GNSO Council (30 July 2025).
- A dedicated GNSO Small Team was formed in August 2025 to assist in the formulation and eventual issuance of GNSO Council Responses and Guidance (13 November 2025) to the Implementation Review Team
- ICANN org resumed regular IRT meetings on 8 January 2026. On 23 January 2026, ICANN org, with input from the IRT, published an Implementation Plan and Work Breakdown to guide the development and deployment of a PPSAI Consensus Policy and the related Disclosure Frameworks. Over the 2026 calendar year, the IRT is expected to sequentially develop the four modules expected to compose the ultimate Accreditation framework: definitions of key terms (by May 2026), Consensus Policy language (by July 2026), data disclosure frameworks (by August 2026) and a human rights impact assessment (by October 2026). All these elements would be subject to a Public Comment proceeding by December 2026.
- In the GAC Seville Communiqué (15 June 2026) the GAC:
  - Urged the PPSAI IRT to work toward establishing an accreditation system that helps prevent misuse of privacy and proxy services, in which registration data records should reliably indicate whether a privacy or proxy service was used in a registration and provide information about the service used, so that parties with a legitimate interest know where they can direct inquiries, regardless of how many resellers or other intermediaries are involved in a registration.
  - Underscored the importance of the PPSAI Final Report recommendation which states that "*Registrars are not to knowingly accept registrations from privacy or proxy service providers who are not accredited through the process developed by ICANN.*"
  - Stressed that the privacy and proxy service accreditation system should provide a path to address cases of unaccredited operators offering their own privacy or proxy services, regardless of whether such unaccredited services are offered by affiliates of registrars, resellers, and other intermediaries within the registration chain.
  - Reiterated that the RDRS or its successor system should integrate support for disclosure requests related to data underlying privacy and proxy registrations.
- At the time of ICANN87 preparation, the reconvened PPSAI IRT continues to consider and discuss the proposed Draft ICANN Consensus Policy in implementation of the 2015 GNSO Policy Recommendations, aiming to create a framework to standardize business practices including regarding disclosure of underlying registration data when such services are involved in domain name registration.

- **GNSO work on Accuracy of Registration Data**, originally within a Scoping Team formed in October 2021 and subsequently paused for several years, **resumed** in a GNSO Small Team on Accuracy format (15 May 2025) which made recommendations to the GNSO Council (31 July 2025). **Recommendation 1 to examine the process for registrars to validate and verify registration data, is identified for possible future work** in the Final Issue Report on a PDP on DNS Abuse Mitigation (4 December 2025)
    - The GNSO Council adopted substantive and procedural instructions for the Scoping Team (22 July 2021). In the ICANN72 GAC Communiqué (1 Nov. 2021) the GAC welcomed "*the effective start of the accuracy scoping exercise launched by the GNSO*" and expressed support for "*all four assignments"* of the team. The GAC nominated representatives from the European Commission and United States to participate in these weekly deliberations which started on 5 October 2021.
    - The work of the scoping team was informed by an ICANN org briefing (26 February 2021), an ICANN org Memo on the WHOIS Accuracy Reporting System (January 2022) and ICANN org responses to questions by the Scoping Team.
    - In the ICANN72 GAC Communiqué (1 November 2021) the GAC reiterated "*that **maintaining accurate domain name registration data is an important element in the prevention and mitigation of DNS abuse***". The GAC also noted that it is "*looking forward to exchanging with other constituencies not only on the definition and measurement of accuracy but also on solutions on how to enhance accuracy. **The GAC gives particular importance to the verification, validation and correction of all registration data** by registrars, and certain registries, in line with their contractual obligations, and supports rigorous monitoring and enforcement of such contractual obligations by ICANN."*
    - In the ICANN73 Communiqué (14 March 2022), the GAC highlighted that as part of the work of the scoping team to date, it "*has emphasized the **importance of holding contracted parties accountable for their compliance with the existing accuracy requirements**, as well as the **importance of increasing transparency about compliance**, in order to inform an evidence-based analysis of these issues*"
    - In May 2022, the **ICANN org shared with the Scoping Team** a set of scenarios **for which it planned to consult the European Data Protection Board** on whether or not ICANN org has a legitimate purpose that is proportionate (i.e. not outweighed by the privacy rights of the individual data subjects) to request that Contracted Parties provide access to registration data records for purposes of accuracy verification.
    - In its preliminary recommendations for the GNSO Council (2 September 2022) the scoping team recommended:
        - **A registrar Survey** be conducted on the status of accuracy of their domains under management (Recommendation 1). In the ICANN74 Communiqué (20 June 2022), the GAC noted that "*the voluntary nature of the survey [...] could limit the volume of feedback received"* and therefore encouraged "*the team to explore additional and complementary work items, such as testing accuracy controls in a manner that is not dependent upon access to personally identifiable data*". However, the preliminary

report notes that "[*a*]*t this stage, the Scoping Team has not identified sufficient benefits of moving forward with any of the other proposals that do not require access to registration data [...]*".

- **A Registrar Audit** be considered regarding Registrars procedures for determining the accuracy of registration data (Recommendation 2)
- **A pause of scoping team work in relation to proposals that require access to registration data** until feasibility is clearer (Recommendation 3) including through: ICANN org's outreach to the European Data Protection Board (EDPB), a possible Data Protection Impact Assessment to be conducted by ICANN, and the finalization of Data Processing Agreements between ICANN and Contracted Parties.

- **GNSO Council adopted a** motion (17 Nov. 2022) **pausing the work of the scoping team and deferring consideration of the recommendations to conduct a survey and an audit** "*until such time the DPA negotiations between ICANN org and Contracted Parties have completed and there is feedback from ICANN org on if/how it anticipates the requesting and processing of registration data will be undertaken in the context of measuring accuracy, or for six months, whichever is the shorter*".
- In a GNSO Council letter to ICANN org (1 December 2022), **ICANN org was requested to "*Proceed with both (i) your outreach to the European Data Protection Board and (ii) your work on a Data Protection Impact Assessment*** *in connection with the scenario(s) in which the request and processing of registration data takes place as a matter of urgency;* ***Finalize negotiations on the Data Processing Agreement (DPA) as soon as practicable****, as the absence of a completed DPA may act as a roadblock for the policy work before the GNSO Council."*
- In a correspondence to the GNSO Council (14 March 2023) ICANN org reported it has determined that "***a sufficient legal basis exist to proceed*****" to conduct proactive contractual compliance audit(s) of registrar compliance with registration data validation and verification requirements** (Scenario 2), while further, more targeted outreach with European data protection authorities may be required[9] regarding analysis by ICANN of a sample of full registration data for validation and verification of contact data (Scenario 3)
- In the Washington D.C. Communiqué (20 June 2023), the GAC welcomed "*ICANN org's completion of a Data Protection Impact Assessment (DPIA) on a contractual compliance audit that could shed light on the current state of accuracy*" and sought "*an update on plans to resume the Scoping Team's work*" given that "*over six months have passed since the GNSO adopted a motion to pause the work of the Scoping Team*". It further proposed that "*further consideration [be given] to activities that may be resumed by the Accuracy Scoping Team*".
- In a GNSO Council letter (3 August 2023) sent to ICANN org and Contracted Parties, the GNSO Council indicated it is "*awaiting on the one hand the outcome of the work by ICANN*

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

org on the scenario(s) in which the request and processing of registration data takes place and on the other hand the finalization of the Data Processing Agreement (DPA) [...]."

- Regarding the completion of DPAs, in the Washington D.C. Communiqué (20 June 2023), the GAC flagged "*it would be helpful to receive quarterly updates on the status of the DPAs*". The ICANN Board responded in its Comments on the Issues of Importance in the D.C. Communiqué (18 September): "***ICANN org and the Contracted Parties have just a few issues remaining to negotiate. ICANN org will conduct a public comment period on the DPS once negotiations are completed**, so the community can review the terms. Both ICANN org and the Contracted Parties say they remain optimistic the DPS will be in place in time for the implementation of the Registration Data Policy."*
- Before ICANN78, ICANN org shared with the GNSO Council its analysis (13 October 2023) of 4 scenarios that were previously identified (9 May 2022) as it relates to ICANN's possibilities for reviewing the accuracy of registration data[10]. In its analysis, **ICANN org concludes that there are several deficiencies and challenges in pursuing the scenarios** and in particular that "*ICANN org does not have a legitimate purpose that is proportionate, i.e., not outweighed by the privacy rights of the individual data subject(s) to request Contracted Parties to provide access to individual records as well as bulk access to registration data in order to review the accuracy of registration data".*
  Alternatively, ICANN org suggests that the ICANN community considers leveraging historical data of ICANN's compliance audit program for assessing current validation and verification requirements under the RAA, **and for contracted parties to analyze existing accuracy and verification practices in Europe "*as they weigh how to engage in accuracy policy-related discussions at ICANN*"**. ICANN further indicates that "*it is compiling these practices and intends to share them with ICANN's contracted parties to demonstrate the potential for more complex requirements that may come outside ICANN's multistakeholder model, should the ICANN consensus policy making process be considered ineffective in addressing the issue*."
- In the meantime, the **GNSO Council** resolved (15 February 2024) to **extend "*the deferral of consideration of recommendations #1 and #2 of the Registration Data Accuracy Scoping Team [...] for an additional six months*"** while committing to "*considering the Scoping Team recommendations at an earlier date if DPA negotiations have been completed before six months have passed or another significant event, such as the implementation of the NIS2 directive or the publication Inferential Analysis of Maliciously Registered Domains (INFERMAL) Study, occurs before six months have passed*".
- Following the publication by ICANN of a draft Data Processing Specifications (DPS) applicable to the Registrar Accreditation Agreement and Registry Agreement (29 July 2024), the GNSO Council resolved (19 September 2024) to continue "*defer[ing] consideration of the Registration Data Accuracy Scoping Team's Recommendations #1 and*

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

#2 for an additional six months while it determines how to make meaningful progress on the topic" while "*recogniz[ing] the importance of Registration Data Accuracy to the ICANN community and commits to continue its discussion of how best to move forward on this topic.*"

- In response to the GNSO's regulatory questions, as part of its Concept Proposal: Structured SG Assignments for Addressing Accuracy Scoping Team Recommendations and Way Forward (12 September 2024), ICANN org discussed (10 December 2024) legislative efforts and their impact on registration data accuracy obligations, and stressed the view that "*there is no direct conflict between the [NIS2] implementing laws and ICANN policy and contract requirements*".
- In response the GNSO's "threshold" questions several GNSO stakeholder groups and Advisory Committees provided their input, including the GAC Input on GNSO Council Questions regarding Domain Registration Data Accuracy (14 February 2025)
- A GNSO Council Small Team was formed (15 May 2025) to review this input and other relevant sources, and to recommend to the Council how best to make progress on this topic.
- In the ICANN83 GAC Prague Communiqué (16 June 2025), the GAC continued to emphasize the importance of accuracy in domain registration data and expressed continued concerns regarding the pause in the work of the Accuracy Scoping Team since 2022. The GAC welcomed "*the preliminary ideas shared during ICANN83 by the GNSO regarding the work of the new GNSO Small Team"* and noted "*with interest the idea to investigate shortening the timeline for registrars to perform registration data validation and verification."*
- On 14 August 2025, the GNSO Council unanimously approved the recommendation of GNSO Small Team on Registration Data Accuracy (31 July 2025) to:
  - **Examine the existing process for validating and verifying registration data** under the 2024 Registrar Accreditation agreement and the potential impact on registrants if this process is modified (Recommendation 1)
  - **Create clear and user-friendly educational materials** that could be provided before, during, and after domain name registration to educate registrant on the importance of providing and maintaining accurate registration data (Recommendation 2)
  - **Further consideration of the Registration Directory Service (RDS) Whois 2 Review Team's outstanding board-approved recommendation CC.1 regarding the suspension of domain whose contact data is accurate** (Recommendation 3)
  - **Discontinuing further work of the Accuracy Scoping Team** (Recommendation 4)
- Recommendation 1 of the Small Team on Registration Data Accuracy was reflected in the Final Issue Report on a Policy Development Process on DNS Abuse Mitigation (4 December 2025) which discusses the "*Lack of Proactive/Timely Contact Verification*" as a potential policy gap to mitigate DNS Abuse and for which a potential solution identified is to "*examining the existing process for validating and verifying registration data under 2024 Registrar Accreditation Agreement*" (See p.14).

- In the GAC Dublin Commmuniqué (3 November 2025), the GAC:
  - Recommended that registrars be required validation and verification of registration data before a newly registered domain name can become accessible through the DNS,
  - Encouraged ICANN org undertake a holistic assessments of the evolution of technologies and registration practices that may affect the accuracy and reliability of domain registration data,
  - Called for the ICANN community to maintain an active forum in which to continue discussing possible next steps related to accuracy.
- In the GAC Mumbai Communiqué (16 March 2026), the GAC The GAC expresses "*strong interest in engaging further with the Board and the Contracted Parties on how to address – in a swift and effective manner – the current 15-day timeline for registrars to validate and verify registrants contact information*" noting that as stated in the INFERMAL study (8 Nov. 2024) "*when the validation of registrant information takes place during the account creation or before the domain purchase, it is associated with a 70% decrease in malicious registrations*". The GAC thus proposed that "*to mitigate DNS Abuse, verification of registrant contact information should take place before a newly registered domain name can become accessible through the DNS. A possible path to be further explored in this regard is contract amendments, and the GAC will continue to consider the best path for efficient implementation.*"
- Following the ICANN86 discussion of this matter between the GAC, Registrar and GNSO leadership (9 June 2026), the GAC stressed in its Seville Communiqué (15 June 2026) its eagerness "*to review the current rules, particularly ahead of the delegation of new gTLDs strings, taking into account all relevant aspects of this issue, including potential operational and financial challenges to registrars*." and that "*recognizing the substantial research already undertaken and the recommendations made*[11]*, [...] discussions should focus on identifying practical implementation pathways*". The GAC also highlighted the importance of "*early involvement of the ICANN Board in these discussions with the Contracted Parties and the GAC*"
- In response to the Seville Communiqué, the ICANN Board (10 July 2026) encouraged the GAC to "*further engage on the topic and where applicable, identify and consider additional data sources that help determine the scope of the issue*" and indicated it "*would welcome the GNSO's progress on its prioritized PDPs before initiating new work on DNS Abuse*".
- The Board also clarified in its more recent response (14 September 2026) to the GAC Chair's request to convene a Tri-lateral setting (11 May 2026), that: "*only two mechanisms exist to [create new obligations or modify existing ones]: contractual negotiations and gTLD policy development.*"

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

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

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

- **Policy Development in Phase 2 of the EPDP on Registration Data concluded** with the publication of a Final Report (31 July 2020), which recommended a System for Standardized Access/Disclosure (SSAD) to gTLD Registration Data with a significant level of divergence among stakeholders as documented in the Consensus Designations (Annex D) and Minority Statements (Annex E), including the GAC Minority Statement (24 August 2020).
    - **Consensus was achieved on** aspects of the SSAD relating to **accreditation of requestors and centralization of requests** (recommendations 1-4, 11, 13 and 15-17). Once implemented these recommendations should improve the current fragmented systems by providing a central entry point to request access to registration data, according to clearly defined standards, and providing guarantees of appropriate processing.
    - **Stakeholders could not agree on** the policy recommendations necessary to provide for **a System for Standardized disclosure** that meets the needs of all stakeholders involved, including public authorities (recommendations 5-10 and 12). Neither could stakeholders agree on the possibility to evolve the SSAD towards more centralization and more automation of disclosure decisions in the future. (recommendation 18)
    - In the ICANN70 GAC Communiqué (25 March 2021), the GAC advised the ICANN Board "*to consider the GAC Minority Statement and available options to address the public policy concerns expressed therein, and take necessary action, as appropriate.*" The Board accepted the advice (12 May 2021) noting that "*standing on its own, the GAC's Minority Statement does not constitute consensus advice",* and included a detailed discussion of issues raised in the GAC Minority Statement on EPDP Phase 2.
    - The GAC issued a response (6 October 2021) to the Board's clarifying questions on the ICANN70 advice that were reiterated before and discussed during the GAC/Board ICANN71 Communiqué clarification call (29 July 2021)
    - In the context of the then expected roll out of a pilot Registration Data Request Service (RDRS), the **ICANN Board** confirmed (9 June 2022) its agreement with the GNSO and **decision to pause the consideration of the EPDP Phase 2 policy recommendations**.
    - Since ICANN85 (March 2025), **the ICANN Board and GNSO Council took the necessary steps to launch the process** described in the ICANN Bylaws, Annex A, Sec. 9 **which provides for modification of GNSO Policy Recommendations** (Supplemental Recommendations). This process was discussed in the GNSO Council in January 2026 and an initial dialogue with members of the ICANN Board took place in the GNSO Council meeting on Thursday 12 February (see Agenda Item 5)
        - The ICANN Board resolved to not adopt the original SSAD Recommendations (12 March 2026)
        - The GNSO Council convened the SSAD Supplemental Recommendations Team (SRT) to propose modifications to the original 18 SSAD recommendations by February 2027.

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

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

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

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

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

        > *50. The value section of the "Reseller" field SHOULD be shown, but MAY be left blank or the whole field MAY not be shown at all. If shown, the value of the field MUST be the name of the organization, in case the Reseller for the name is a legal entity, or a natural person name otherwise.*

    - In the context of the phasing out of the WHOIS protocol and its replacement by the Registration Data Access Protocol, in GAC Comments on the proposed Registration Data Access Protocol (RDAP) and Bulk Registration Data Access (BRDA) Contractual Amendments (16 November 2022), the GAC noted that the RDAP Response Profile provides that "*the returned domain object in the RDAP response MAY contain an entity with the reseller role, if the domain name was registered through a reseller.*" It further stressed that "*In recognition of the purposes of the RDDS system and the evolving domain*

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

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

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

Key Reference Documents

- SSAD Supplemental Recommendations
    - Draft of modified SSAD recommendations (As of Oct. 2026)
    - GNSO Assignment and workspace of SSAD Supplemental Recommendations Team (May 2026)
    - ICANN Board resolution (12 March 2026) to not adopt the original SSAD Recommendations
- Registration Data Request Service (RDRS)
    - GAC Comments (15 December 2025) on the ICANN org RDRS Policy Alignment Analysis (30 October 2026)
    - Final RDRS Standing Committee Report (10 November 2025)
    - ICANN Board resolutions (30 October 2025) regarding the continuation of the Registration Data Request Service (RDRS)
    - GAC Comments (29 Sept. 2025) on the RDRS Standing Committee Report (19 August 2025)
    - RDRS Usage Metrics Reports (since December 2023)
    - Addendum (7 Nov. 2022) to the SSAD ODA Small Team Preliminary Report (4 April 2022) regarding requirements for an SSAD proof of concept.
    - WHOIS Disclosure System ICANN Design Paper (13 Sep. 2022)
- Urgent Requests for disclosure of registration data
    - GNSO Council chair letter (29 April 2026) and related Board acknowledgement (13 May 2026) that the SSAD SRT is expected to address the EPDP Phase 1 Rec. 18 policy gap regarding the “authentication” part of timely response to Urgent Requests
    - Updated Registration Data Policy (12 May 2026)
    - GAC Comments (15 December 2025) on the Timeline for Urgent Request Public Comment Proceeding (22 October 2025)
    - Latest ICANN org proposed Consensus Policy language (3 October 2025)
    - GNSO Council Follow-up - Clarifying Question and Additional Considerations, to GAC Chair (15 January 2024)
    - GAC Chair to ICANN Board (15 October 2024)
    - GNSO Council response to the ICANN Board (29 August 2024)
    - ICANN Board letter to the GNSO Council (3 June 2024)
    - GAC Chair letter to the ICANN Board Chair (23 August 2023) on the timeline for response to Urgent Request in the proposed Final Registration Data Consensus Policy, and ICANN Board response to the GAC Chair (11 February 2024).

- Privacy/Proxy Services Accreditation (PPSAI) Policy Implementation
    - Proposed Draft ICANN Consensus Policy (as of Oct. 2026)
    - Implementation Plan (8 January 2026)
- Policy development on gTLD Registration Data (EPDP Phase 1, 2, 2A)
    - ICANN Board Chair response (24 August 2026), clarifying that initiation of implementation work is expected to take place in FY2027
    - GAC Chair correspondence to the ICANN Board (11 May 2026) regarding the advancement of policy implementation on the collection and publication of legal entities domain name registration data.
    - ICANN org Review of Public Comment (28 Avril 2023) - starting p.40 - on the Draft Registration Data Consensus Policy for gTLDs (24 August 2022)
    - GAC Comments (21 November 2022) on the Draft Registration Data Consensus Policy for gTLDs (24 August 2022)
    - Draft Registration Data Consensus Policy for gTLDs (24 August 2022)
    - ICANN org Operational Design Assessment of the SSAD (25 January 2022)
    - GAC Minority Statement (10 Sep. 2021) on EPDP Phase 2A Final Report (3 Sep. 2021)
    - GAC Minority Statement (24 August 2020) on EPDP Phase 2 Final Report (31 July 2020)
- Accuracy of Registration Data
    - ICANN Board response (14 September 2026) to the GAC Chair's request to convene a Tri-lateral setting (11 May 2026)
    - GAC Chair correspondence to the ICANN Board and GNSO Council (11 May 2026) seeking the convening of a trilateral dialogue to address domain registration data accuracy during ICANN86.
    - Final Issue Report on a Policy Development Process on DNS Abuse Mitigation (4 December 2025) which discusses the "*Lack of Proactive/Timely Contact Verification*" as a potential policy gap to mitigate DNS Abuse and for which a potential solution identified is the GNSO Council Accuracy Small Team recommendation to "*examining the existing process for validating and verifying registration data under 2024 Registrar Accreditation Agreement*" (See p.14)
    - Panel discussion on Accuracy during the ICANN84 GAC Plenary Session on Registration Data (28 October 2025) as reflected in the Minutes of the GAC ICANN84 Dublin Meeting (p. 7)
    - ICANN Compliance Presentation on the Enforcement of accuracy-related requirements (15 October 2025) during a GAC Pre-ICANN84 Webinar
    - Recommendations (31 July 2025) of the GNSO Small Team on Registration Data Accuracy, adopted by the GNSO Council (14 August 2025)
    - Assignment and deliberations of the GNSO Small Team on Accuracy (15 May 2025)

- GAC Input on GNSO Council Questions regarding Domain Registration Data Accuracy (14 February 2025) and input from other Advisory Committees and Stakeholder Groups.
- ICANN org response to GNSO Council regulatory questions (10 December 2024)
- ICANN org Assessment of Registration Data Accuracy Scenarios (13 October 2023)
- ICANN Org Correspondence to the GNSO Council regarding the Registration Data Accuracy Scoping Team (14 March 2023)
- Accuracy Scoping Team preliminary recommendations to the GNSO Council (2 Sep. 2022)
- ICANN org Update to the Accuracy Scoping Team on scenarios for EDPB engagement (9 May 2022)

- GAC Communiqué and Board response
  - ICANN86 Seville Communiqué (15 June 2026) Issues of Importance related to Urgent Requests and Requestor Authentication, RDRS/SSAD, Privacy and Proxy Services, and Accuracy of Registration Data; as well as:
    - ICANN Board Comments on the Issues of Importance (10 July 2026)
  - ICANN85 Mumbai Communiqué (16 March 2026) Issues of Importance related to Urgent Requests, RDRS/SSAD, Privacy and Proxy Services, and Accuracy of Registration Data (under the heading of DNS Abuse); as well as:
    - ICANN Board Comments on the Issues of Importance (20 April 2026)
  - ICANN84 Dublin Communiqué (3 November 2025) Issues of Importance related to the Urgent Requests, RDRS, Accuracy of Registration Data; as well as:
    - ICANN Board Comments on the Issues of Importance (6 January 2026)
  - ICANN83 Prague Communiqué (16 June 2025) Issues of Importance related to the Urgent Requests, RDRS, Accuracy of Registration Data; as well as:
    - ICANN Board Comments on the Issues of Importance (1 October 2025)
  - ICANN82 Seattle Communiqué (17 March 2025) Issues of Importance related to the Urgent Requests, RDRS, Accuracy of Registration Data, and Other Public Policy Concerns Regarding Registration Data; as well as:
    - ICANN Board Comments on the Issues of Importance (4 April 2025)
  - ICANN81 Istanbul Communiqué (18 November 2024) Issues of Importance related to the RDRS, Privacy/Proxy Accreditation Policy Implementation, Registration Data Accuracy, and Urgent Requests; as well as:
    - ICANN Board Comments on the Issues of Importance (29 January 2025)
  - ICANN80 Kigali Communiqué (11 June 2024) Follow-up on Previous Advice regarding Urgent Requests, and Issues of Importance related to the RDRS, Registration Data Accuracy, and Privacy/Proxy Accreditation Policy Implementation; as well as:

        - Scorecard of Board Action regarding the Follow-up on Previous Advice regarding Urgent Requests (7 September 2024)
        - ICANN Board Comments on the Issues of Importance (15 October 2024)
    - ICANN79 San Juan Communiqué (11 March 2024) GAC Advice on Urgent Requests, and Issues of Importance related to the RDRS, Privacy/Proxy Accreditation Policy Implementation, and Registration Data Accuracy; as well as:
        - Scorecard of Board Action regarding Advice in the San Juan Communiqué (5 May 2024)
        - ICANN Board Comments on the Issues of Importance (9 May 2024)
    - GAC Washington D.C. Communiqué (20 June 2023) Follow up on Previous GAC Advice on Privacy Proxy Services; and Issues of Importance in the on the Registration Data Consensus Accuracy, the RDDS and the Registration Data Consensus Policy, as well as:
        - Scorecard of Board Action regarding Advice in the D.C. Communiqué (10 Sep. 2023)
        - ICANN Board Comments on the Issues of Importance (18 September 2023)
    - GAC Advice in the ICANN76 Cancún Communiqué (20 March 2023) on Privacy/Proxy Services, and the related
        - Summary Notes of the Board/GAC Clarification Call (11 April 2023)
        - Scorecard of Board Action regarding Advice in the GAC Cancún Communiqué
    - GAC Advice in the GAC ICANN72 Communiqué (1 Nov. 2021) and related ICANN Board Scorecard (16 January 2022)
    - GAC Advice in the GAC ICANN71 Communiqué (21 June 2021) and related ICANN Board Scorecard (12 September 2021)
    - GAC Advice in the GAC ICANN70 Communiqué (25 March 2021), related ICANN Board Scorecard (12 May 2021) and GAC Response to ICANN Board Clarifying Questions (16 Nov. 2021)
    - GAC Response (6 October 2021) to ICANN Board Clarifying Questions (21 April 2021) on the ICANN70 GAC Advice regarding the GAC Minority Statement on EPDP Phase 2, as reiterated during the ICANN71 Communiqué clarification discussions.

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ICANN | GAC
Governmental Advisory Committee

ICANN 87 ANNUAL GENERAL MEETING

Operational Planning

Session 8

Contents

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Session Objective

This working session will focus on practical aspects of GAC operations, participation and effectiveness. It will provide an opportunity for GAC Members and Observers to:

- Review the current distribution of GAC leadership, liaison, Working Group, Topic Lead and other volunteer roles, and identify opportunities for broader participation;
- Consider and vote on the proposed administrative amendments to the GAC Operating Principles following completion of the 60-day consultation period initiated at ICANN86;
- Agree next steps for implementation of the Continuous Improvement Program (CIP); and
- Time permitting, take stock of implementation of the current GAC Annual Plan and identify lessons to inform the next planning cycle.

Leadership Proposal for GAC Action

The GAC is invited to:

- Consider opportunities for additional GAC members to contribute to GAC roles and activities;
- Vote on the proposed administrative amendments to the GAC Operating Principles in accordance with the applicable revision procedure;
- Agree to commence the GAC's first CIP cycle, beginning with the Assessment and Prioritisation phase; and

- Time permitting, identify practical lessons from implementation of the current Annual Plan that should inform the next planning cycle.

Follow-up work will continue intersessionally, with GAC member participation and GAC Support, and will be brought back to the all GAC Members and Observers as appropriate.

Session Outline

1. GAC Roles and Participation

A significant part of the GAC's work is undertaken by members who volunteer for responsibilities beyond their participation as GAC representatives or observers.

These roles take different forms. Topic Leads and Small Groups help coordinate GAC work on particular policy issues; Points of Contact help maintain relationships with other ICANN community groups; Working Group leaders coordinate established areas of GAC work; and GAC appointees represent or contribute GAC perspectives in specific ICANN or cross-community processes.

This ICANN87 session provides an opportunity for GAC Members and Observers to take stock of the current distribution of these responsibilities; the overview will include:

- the GAC leadership transition taking place at ICANN87;
- current Working Group, Topic Lead and Point of Contact roles;
- relevant cross-community appointments;
- current or upcoming vacancies and role reviews; and
- opportunities for additional GAC members to become involved.

The purpose is to provide members with a clear overview of existing roles, current or upcoming vacancies and opportunities to become more involved in GAC work. Members will be invited to consider whether they, or others in their delegations, may be interested in particular roles or areas of work.

2. GAC Operating Principles - Administrative Amendments

At ICANN86, GAC Members agreed to initiate the formal revision process for a set of proposed administrative amendments to the GAC Operating Principles. The amendments are intended to improve clarity, consistency and alignment with current GAC practices and references.

Following the ICANN86 decision, the proposal underwent the required 60-day consultation period. No additional comments were received during that period beyond feedback submitted in June. The

more substantive issues raised in that feedback will be retained for the GOPE WG's subsequent phase of work.

In accordance with the applicable revision procedure, the proposal will now return to the GAC for a vote at ICANN87.

Discussion and decision: Members will be invited to consider and vote on the proposed administrative amendments.

3. Continuous Improvement Program: Starting the GAC's First Cycle

The Continuous Improvement Program (CIP) was developed by the ICANN community following a recommendation from the Third Accountability and Transparency Review (ATRT3). Its purpose is to help ICANN's Supporting Organizations, Advisory Committees and the Nominating Committee regularly consider how effectively they are working and where improvements may be useful.

For the GAC, this will be a **GAC-led self-assessment**, not an external review. The proposed approach is specifically designed to avoid creating a burdensome exercise. As far as possible, it will use information and work that already exist, including the GAC Strategic Plan, Annual Plan and previous work on GAC effectiveness.

Per CIP proposal the first stage is called **Assessment and Prioritisation**. In simple terms, the work will:

1. agree what effective GAC performance looks like;
2. use existing information to assess where the GAC currently stands;
3. identify areas where improvement may be useful; and
4. select a manageable number of priorities to take forward.

The GAC is **not being asked to carry out this assessment during ICANN87**, nor to agree now on specific improvements.

What will happen after ICANN87:
The detailed work will take place intersessionally. This will include developing the GAC's effectiveness criteria, reviewing existing information, identifying possible areas for improvement, and proposing a manageable set of priorities. The results will then be brought back to the full GAC for consideration before further action is taken.

4. Annual Plan Stocktake and Lessons for the Next Cycle

The GAC Annual Plan translates the Committee's longer-term Strategic Plan into more specific Expected Outcomes for each annual planning cycle. The current 2025/2026 Plan covers nine Strategic Objectives, including both substantive policy priorities and objectives concerning the GAC's own effectiveness and participation.

The accompanying Progress Tracker records progress against those Expected Outcomes. The current tracker, last updated on **2 June 2026**, shows substantial activity across the Plan while also identifying areas where work has faced challenges, has not yet started, or has required further prioritisation or ownership.

A refreshed high-level overview will be provided during the session. The purpose is **not to review every Expected Outcome or begin drafting the next Annual Plan**, but to identify a small number of practical lessons from the current cycle.

Discussion focus: Members will be invited to consider:

- What has worked well in using the Annual Plan to organise and prioritise GAC work?
- What lessons from implementation should be carried forward into the next planning cycle?
- Are some activities better treated as ongoing work rather than annual priorities?
- Are there lessons regarding prioritisation, ownership or follow-up that should inform the next Annual Plan?

The discussion will provide initial input for subsequent development of the next Annual Plan, including preparations for the **annual Chair and Vice-Chairs planning meeting in April 2027**.

Further Information

- GAC Annual Plan (2025/2026)
- GAC Strategic Plan (2024/2028)
- Proposed Administrative Amendments to the GAC Operating Principles – Clean
- Proposed Administrative Amendments to the GAC Operating Principles – Redline
- CIP Framework (July 2025)

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GAC Meeting with the GNSO Council

Session #9

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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. **DNS Abuse**
    a. PDP1 progress
    b. PDP2 Charter/status and anticipated next steps
2. **15-Day Verification / Accuracy**
    a. Follow-up to pre-ICANN87 GAC Topic Leads/CPH discussion
3. **SSAD**
    a. Supplemental Recommendations Team progress
    b. Update following ICANN87 Day -1 work
4. **GAC/GNSO Priorities**
    a. GNSO ADR/prioritization
    b. GAC priorities for the coming year
5. **AOB**

Talking Points

1. DNS Abuse

GAC Talking Points/Questions:

GNSO to provide an update on PDP1 progress/current status and the PDP2 Charter, including any information available on anticipated timing/next steps.

GAC Topic Leads expect that the following be discussed by the GNSO Council:

- Progress on PDP1 including possible timeline for completion
- Update from the PDP2 Chartering Team and timeline for working group convening and deliberations
- Discussion of broader DNS abuse developments (including progress on the policy gaps identified in the Issue Report)

GNSO Council Talking Points/Questions:

Developing policy around domain name registration data and DNS Abuse mitigation requires balancing law enforcement and public safety objectives with privacy, data protection, due process, and the rights of domain name registrants, including the right to recourse in the case of erroneous actions. The Council would welcome GAC members' insights on how they view this balance and how it informs their approach to participating in the development of and providing advice on ICANN policy. In particular:

1. What process do GAC members follow when reviewing and developing their position on ICANN policies? Do GAC members typically consult with experts or other authorities within their governments on matters discussed within ICANN?
2. How can GAC members' experience and expertise with due process and redress mechanisms in broader public policy help inform the development of policies for gTLD domain names?

2. 15-Day Verification / Accuracy

GAC Talking Points/Questions:

Agreed focus: follow-up on the long-standing GAC interest in the 15-day verification period/accuracy, informed by the separate pre-ICANN87 exchange with the CPH. GAC questions are to be shared with the CPH in advance so relevant data can be prepared.

In addition to discussing the GNSO's question 1, GAC Topic Leads suggested that the GAC and GNSO Council follow-up on the 28 September call between GAC and GNSO Topic Leads on the 15-day verification timeline, possibly focussing on:

- What categories of registrations (new registrations vs. renewals) should be prioritized
- Applicable verification timeline to each categories
- Possible implementation path

GNSO Council Talking Points/Questions:

As the ICANN community considers proposals related to registration data accuracy, verification, and DNS abuse mitigation, the Council would welcome insights from GAC members whose governments or ccTLD operators have experience with similar measures. The Council recognizes that ccTLDs operate within distinct national legal, regulatory, and operational frameworks and are not direct corollaries to the gTLD environment. Nevertheless, the successes and challenges from real-world implementation can offer valuable insights for the community as it considers the potential effectiveness, costs, and operational implications of different approaches. In particular, it would be helpful to understand:

1. Have registration or verification requirements, or shorter timeframes for addressing abusive registrations, resulted in measurable improvements in preventing or mitigating DNS abuse?
2. Are there data, studies, metrics, or operational experience that could help assess the effectiveness of these approaches?
3. Have implementation challenges, unintended consequences, or limitations emerged that could help inform consideration of similar measures in the gTLD space?

3. SSAD

GAC Talking Points/Questions:

Agreed focus: take stock of progress in the SSAD Supplemental Recommendations Team and GAC priority areas, with Marc Anderson invited for possible Q&A.

<u>Background/Statements</u>

- The GAC is pleased to have representation on the SSAD SRT and intends to continue closely following the group's work, given the importance of the issues at stake for governments.
- The GAC urges the SRT to complete its work within its expected timeline, to avoid delaying the establishment of a permanent central portal for data disclosure requests at ICANN.
- The GAC also reiterates that it shares the Board's vision for the future of the RDRS, as expressed in the RDRS Policy Alignment Analysis. The SRT's updated recommendations should reflect that vision.
- The GAC emphasizes that governments are a distinct category of registration data requestor and that their needs should continue to be reflected in the development of a permanent disclosure request system.

Question

- Does the GNSO still expect the SRT's completed recommendations to be sent to the GNSO Council for review early next year, before ICANN88? What main issues remain to be resolved through SRT discussions, in the GNSO's view?

4. GAC/GNSO Priorities

Agreed focus: GNSO overview of its ADR/prioritization work and early results; GAC opportunity to share priorities for the coming year. GNSO may also provide questions for the GAC.

5. AOB

Background

With the pace of GAC participation in ICANN policy development activities changing in recent years, information sharing with various parts of the ICANN community has become increasingly valuable in helping GAC members understand the context of DNS policy issues. At recent ICANN 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 regularly meets with the Chair and other members of the GNSO Council at ICANN Public Meetings to discuss issues of common concern and identify opportunities for enhanced cooperation. The current GNSO Council Chair is Susan Payne, with Jennifer Chung and Taiwo Peter Akinremi serving as Vice-Chairs. The GNSO Liaison to the GAC is Sebastien Ducos. The GAC Points of Contact 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 non-contracted parties representing commercial and non-commercial interests.

The GNSO Council and the GNSO stakeholder groups have different roles within the GNSO. The Council manages the policy development process and is composed of representatives from the various GNSO stakeholder groups and constituencies. Comparatively, the stakeholder groups themselves – including the Registry Stakeholder Group (RySG) and Registrar Stakeholder Group (RrSG) – focus on their respective stakeholder interests, share information, and support their

members' participation in GNSO activities. Members of the stakeholder groups also participate directly in policy development working groups.

Prior to ICANN Public Meetings, the GAC and GNSO coordinate to identify issues of common interest for discussion during their bilateral meetings. In preparation for ICANN87, GAC and GNSO Topic Leads met intersessionally to discuss potential bilateral topics and facilitate substantive preparation ahead of the 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

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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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ICANN 87 ANNUAL GENERAL MEETING

DNS Abuse Mitigation

GAC Plenary Session 12

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Session Objectives: GAC Plenary Session

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 the GAC 2025/2026 Annual Plan which sets out a two-pronged approach to the GAC's work on DNS Abuse, focusing on: 1) advancing policy work, and 2) developing the capacity of GAC members on this subject, during ICANN87 the GAC will discuss:

- Public Comments received on the Initial Report of the PDP1 Working Group on Associated Domain Checks including areas of convergence and divergence between the GAC and the different communities participating in the PDP
- Chartering of the subsequent PDP2 on Safeguards for access to domain name registrations at scale for new customers, including perspectives of the GAC and other community groups and potential timeline
- Several presentations (by the Host Country, Japan, ICANN OCTO and ICANN Compliance) to inform ongoing deliberations in the ICANN Community and the GAC

Session Objectives: GNSO PDP1 WG Sessions

The GNSO Council requested an Issue Report on DNS Abuse in August 2025. A Preliminary Issue Report on a DNS Abuse PDP (8 September 2025) was finalized in December 2025 following input from the ICANN community, including GAC Comments (18 October 2025). Subsequently, the GNSO Council determined to initiate two PDPs on Associated Domain Checks (PDP1) and on Safeguards for Unrestricted Application Programming Interface (API) access to new customers (PDP2).

The GNSO has formed the PDP1 Working Group (WG), which was convened for the first time during ICANN85 and has published its Initial Report (18 August 2026) for Public Comment. The GAC who is represented in this PDP by 4 delegates, and numerous observers that have been working to prepare and coordinate GAC input within the GAC Small Group on DNS Abuse. GAC Comments on the Initial Report (28 September 2026) were submitted, along with 39 other community contributions.

Throughout the duration of ICANN87, the DNS Abuse PDP1 Working Group is expected to hold 4 sessions, during which PDP WG participants will start deliberating on whether the comments received warrant modifications of the Initial Report, towards publishing a Final Report, possibly during the first quarter of the 2027.

These DNS Abuse Mitigation PDP1 Session are scheduled as follows:

- Session 1: Saturday 17 October at 10:30am (UTC+8)
- Session 2: Saturday 17 October at 13:15am (UTC+8)
- Session 3: Sunday 18 October at 13:15am (UTC+8)
- Session 4: Thursday 22 October at 09:00am (UTC+8)

Leadership Proposal for GAC Action

1. **Consider refining GAC positions based on deliberations in the GNSO DNS Abuse Mitigation PDP1 on Associated Domain Checks**, consistent with GAC expectations laid out in the GAC Comments (18 October 2025) on the Preliminary Issue Report, the initial GAC Positions on the DNS Abuse PDP1 Charter Questions (March 2026) and the GAC Comment on the PDP1 Initial Report (28 September 2026). This discussion will also be informed by various stakeholder group perspectives, as reflected in Public Comments received on the PDP1 WG Initial Report.

2. **Consider GAC positions for deliberation in the GNSO DNS Abuse Mitigation PDP2 on Safeguards for access to domain name registrations at scale for new customers** (i.e. API access or bulk-registration) which is currently being chartered by a GNSO Drafting Team to which the GAC Small Group on DNS Abuse provided GAC Input on the PDP2 Charter (25 September 2026), and ensure the establishment of a **process and timeline to achieve enforceable obligations** in this area **on all gTLDs before the next round of New gTLDs.**

3. **Continue considering 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:
    - **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);
    - **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);
    - **Increased transparency in the reporting obligations** (see gap "C1. Limited Transparency in Mitigation Actions" p.23);
    - **Consensus policy on subdomain abuse** (see gap C4 "Unregulated subdomain abuse" p.26)
    - **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 "Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks" p. 32)

4. Specifically, **progress discussion on re-examining the current 15-day timeline for registrars to validate and verify registrants contact information**, following the GAC-hosted informational session during ICANN86 subsequent to a GAC Chair correspondence (11 May 2026) seeking to convene a trilateral dialogue between the GAC, the ICANN Board and the GNSO.

Current Status and Recent Developments

- **Policy development regarding the prevention and mitigation of DNS Abuse** has been increasingly called for by various stakeholders groups, in light of the expected expansion of the DNS in the Next Round of New gTLDs, and including during the negotiation and subsequent adoption of new Contractual Requirements for Registries and Registrars to mitigate DNS Abuse which entered into force on 5 April 2024 (see next section of this briefing) which were understood as a "first step". Subsequently, momentum built within the ICANN Community for consideration of policy development around specific issues identified in several industry and research contributions (INFERMAL Report and NetBeacon White Paper).
  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*", **the Bylaw-mandated procedural steps were taken to enable the convening of the GNSO DNS Abuse Mitigation PDP1 on Associated Domain Checks during ICANN85**.
  - 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[1].
  - **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 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

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

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[2], **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]
- The GAC Comments (17 July 2023) on the Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations stated 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.****"*
- In the summary report of Public Comments on the new Contract Amendments (1 August 2023) 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 [Negotiation 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****."*
- **The ICANN Board indicated**, during a GAC/Board interaction on the ICANN79 San Juan 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 (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***

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

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

***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*".

- On 15 May 2025, the GNSO Small Team on DNS Abuse **was reconvened following the GNSO Council's 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 included:
  - 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), which conducted analysis of maliciously registered domains, 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).
- **The NetBeacon Proposals for PDPs on DNS Abuse**, published in the form of a White Paper (21 May 2025) offered 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.
- In the ICANN83 GAC Prague Communiqué (16 June 2025), **the GAC advised the ICANN Board 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.*"

- In the ICANN Board Action (14 Sept. 2025) **in response to the ICANN83 GAC Advice, the ICANN Board noted the GNSO Council's request for an Issue Report** from ICANN org on DNS Abuse[4], as had been recommended by the GNSO Small Team on DNS Abuse (31 July 2025), and **stressed that this Issue Report "*is a critical milestone in the process to launch a PDP****, and will include an exploration of the three policy enhancements highlighted by the GAC as priority items, as well as additional items discussed in the small team's report, and a proposal for a narrowly chartered PDP(s) that can be completed swiftly.*". The ICANN Board also stated that "*The Bylaws-mandated step to develop the Issue Report is in place to ensure that a PDP is appropriately scoped within ICANN's Mission and the policy issues are well defined.* ***While this means that a PDP will not be finally initiated by ICANN84, the Board appreciates the commitment from the community and ICANN staff to establish the foundation to initiate the PDP as expeditiously as possible****, presuming the Council determines a PDP is warranted*"
- **Prior to ICANN84**, and in response to the ICANN Public Comment proceeding on the Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation (8 Sept. 2025), the GAC Comments (18 Oct. 2025) **highlighting the need for:**
  - **Process and timeline clarifications to achieve enforceable obligations** on all gTLDs before the next round of New gTLDs on the two issues identified for immediate policy development:
    - **Unrestricted Application Programming Interface (API) access for high-volume registrations** (also referred in previous community discussions as "bulk domain registrations")
    - **Associated Domain Checks** (duty for registrars to proactively investigate other domains registered by a particular registrant or account when abuse is identified on one of their domains)
  - **Clarification of 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:
    - **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);
    - **Addressing registration data accuracy** (see gaps "P2 and P3:Lack of proactive/Timely contact verification" which recall the recommendation of

[4] On 14 August 2025, the GNSO Council resolved, as part of resolution 20250814-1 that "*The GNSO Council accepts the recommendations as outlined in the DNS Abuse Small Team report and requests that an Issue Report be initiated on the topics as outlined by the Small Team and requests that Staff create the report.*". See also p.3 of the vote results on this resolution.

the GNSO Small Team on accuracy of registration data; and "P8. No Post-Registration Identity Checks for Suspicious Activity);

- **Increased transparency in the reporting obligations** (see gap "C1. Limited Transparency in Mitigation Actions" p.23).
- **Consensus policy on subdomain abuse** (see gap C4 "Unregulated subdomain abuse" p.26)
- **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 "Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks" p. 32)

- Following the publication of ICANN's Report of Public Comments (17 November 2025), the Final Issue Report on a Policy Development Process on DNS Abuse Mitigation was released (4 December 2025) and the **GNSO Council** resolved (11 December 2025) to:
  - **First, launch PDP1 on Associated Domain Check**, and form a GNSO Small Team to revise the charter to address concerns from representatives of the Non-Contracted Stakeholder Group (NCSG)[5]
  - **Delay the launch of PDP2 on Safeguards for Unrestricted Application Programming Interface (API) access to new customers** (previously known as "Bulk Registration") **to "*when deemed appropriate based upon the progress and resources needed for PDP1*"**
- The Charter for the PDP1 Working Group on Associated Domain Checks was **adopted by the GNSO Council** (15 January 2026) which launched the convening of the Working Group, the first meeting of which took place during ICANN85.
- In January 2026**, the GAC established its Small Group on DNS Abuse** to "*support and advance strong government engagement of the GAC in DNS Abuse policy development at ICANN*". This GAC Small Group, composed of 17 GAC and PSWG participants from 12 GAC delegations, has been meeting weekly to prepare, inform and coordinate the GAC's engagement in the GNSO DNS Abuse PDP1 Working Group.
- In coordination with the GAC Leadership, the **following individuals currently represent the GAC in PDP1 deliberations,** consistent with the agreed composition of the PDP1 WG:
  - **Martina Barbero** (European Commission)
  - **Gabriel Andrews** (US FBI, PSWG Co-Chair)
  - **Janos Drienyovszki** (European Commission, PSWG Co=-Chair)
  - **Emanuele Lovini** (Europol)
- The PDP1 WG published its Initial Report (18 August 2025) including 8 recommendations and associated guidance addressing the 9 charter questions, including: the definition of the triggers for and investigation of Associated Domain Checks; what should be considered a reasonable such investigation; what the timeline of such investigation should be; how "association" should be determined; what safeguards should be in place

[5] NCSG concerns had been raised in Comments (18 October 2025) on the Preliminary Issue Report and were further laid out in GNSO email correspondence prior to the 11 December 2025 GNSO meeting.

in the performance of ADCs; how the effectiveness of the policy should be measured; and how compliance with the policy should be demonstrated.

- GAC Comments (28 September 2026) were submitted along with 39 other contributions in the Public Comment proceeding. In its Comments, the GAC expressed support for most of the recommendation and implementation guidance as written, with the expectation of Recommendation 5 and 8 for which the GAC suggested and justified the need for wording change. A Report of Public Comment is expected to be published prior to the start of ICANN87.
- Throughout the duration of ICANN87, the DNS Abuse PDP1 Working Group is expected to hold 4 sessions, during which PDP WG participants will start deliberating on whether the comments received warrant modifications of the Initial Report, towards publishing a Final Report, possibly during the first quarter of the 2027[6].
- Prior to ICANN87, the GNSO Council convened a PDP2 Charter Drafting Team which met weekly throughout the September-October period to refine a Draft Charter for a future PDP2 on Safeguards for access to domain name registrations at scale for new customers (previously referred to as API access or bulk-registration).
- 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.

[6] See ICANN87 Schedule for Session 1: Saturday 17 October at 10:30am (UTC+8), Session 2: Saturday 17 October at 13:15am (UTC+8)., Session 3: Sunday 18 October at 13:15am (UTC+8) and Session 4: Thursday 22 October at 09:00am (UTC+8)

- **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[7].
    - **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[8], 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.
        - **The GAC indicated looking forward to "*engaging in subsequent work* with the**

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

*multistakeholder community on DNS Abuse after the amendments are adopted. T**his 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 […]. I**CANN 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[9] .
- 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[10].
- 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*

[9] Detailed voting results available at https://www.icann.org/resources/pages/global-amendment-2024-en
[10] 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** provides regular updates on its enforcement efforts regarding the new contractual requirements. This includes:
  - 12-months Trends Reports on the Enforcement of the DNS Abuse Mitigation Contractual Requirements
  - A Webinar update on the first year of enforcing the DNS Abuse mitigation obligations (23 April 2025),
- During ICANN87 Prep Week, a Contractual Compliance Update is expected to take place on Monday 5 October 2026 at 19:30 UTC.

Key Reference Documents

- GAC Input (25 September 2026) on the Draft PDP2 Charter (ongoing)
- GAC Comments on the PDP1 Initial Report (28 September 2026)
- DNS Abuse PDP1 Working Group Initial Report (18 August 2026)
- Charter for the PDP1 Working Group on Associated Domain Checks (15 January 2026)
- Final Issue Report on a Policy Development Process on DNS Abuse Mitigation (4 December 2025)
- GAC Comments on the Preliminary Issue Report regarding DNS Abuse (18 October 2025))
- ICANN Board Action in response to the ICANN83 GAC Advice (14 Sept. 2025)
- Preliminary Issue Report on a PDP on DNS Abuse Mitigation (8 Sept. 2025)
- Report to the GNSO Council of the Small Team on DNS Abuse (31 July 2025)
- ICANN83 GAC Prague Communiqué (16 June 2025) including GAC Advice to the ICANN Board regarding Policy Development on DNS Abuse issues
- 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, 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)

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GAC Meeting with ICANN Board

Session 14

Session Objectives

The GAC meeting with the ICANN Board provides an opportunity for direct engagement on matters of public-policy importance within ICANN's remit.

At ICANN87, the discussion will address questions submitted by both the Board and the GAC, including RIR governance, preparations for the 2026 New gTLD Round, DNS Abuse, and registration data issues.

The session is intended to facilitate an open and constructive exchange, allowing participants to clarify perspectives, discuss outstanding concerns and explore possible next steps.

Recent Developments

The GAC and Board have continued their engagement since ICANN86 in Seville, including through the Board-GAC Interaction Group (BGIG) and subsequent correspondence on DNS Abuse [link] and registration data issues [link].

For ICANN87, the Board has invited the GAC to address two topics: the Recommended Draft RIR Governance Document and preparations for the 2026 New gTLD Round. The GAC has submitted questions concerning DNS Abuse mitigation, registration data accuracy, urgent disclosure requests and privacy/proxy services.

The bilateral will take place as the 2026 Round moves into application review, following Reveal Day on 7 October, and as the community continues work on DNS Abuse PDP1 and PDP2, the SSAD Supplemental Recommendations Team and related implementation activities.

Session Agenda

Session #14 - Tuesday, 20 October - GAC Meeting with ICANN Board

1. Introductions
2. Questions from the ICANN Board to the GAC
3. Questions from the GAC to the ICANN Board
4. AOB and closing

Questions from the ICANN Board to the GAC

1. RIR Governance

Board Question: The Recommended Draft Regional Internet Registry (RIR) Governance Document outlines ongoing commitments each RIR must meet. Do these operational requirements reflect the GAC's observations in the Issues of Importance from the ICANN85 communiqué? Does the GAC have other areas for consideration, such as potential public policy concerns, to share with the Board or the ASO about the current draft?

GAC Response - **Draft under discussion**[1]

The GAC reviewed the Recommended Draft RIR Governance Document against our observations from the ICANN84 Dublin and ICANN85 Mumbai Communiqués, and our overall assessment is positive. The GAC emphasized public-interest stewardship of Internet number resources, monitoring and auditing against objective and measurable operational criteria, and consistency with ICANN's multistakeholder approach. The Draft addresses much of this through ongoing operational requirements, audits and compliance reviews, and it recognises governments as part of the Numbering Community.

The GAC also reiterates the importance of an appropriate and constructive role for the ICANN community in recognition and derecognition processes, as highlighted in Dublin, and would welcome further clarity on how this could be reflected in the subsequent implementation arrangements. Overall, the GAC welcomes the progress made and encourages timely consideration of the governance framework.

[1] Once the answer is finalised, this briefing will be updated and this footnote removed.

2. 2026 New gTLD Round

Board Questions: How is the GAC coming along with its own preparations to keep up with the 2026 round of new gTLDs?

Can you share examples or generalizations of work GAC reps did in their countries to help governments or applicants be prepared?

GAC Response: The GAC has been doing significant preparatory work to ensure that Members and Observers are ready to engage effectively once applications are published. Building on discussions at ICANN86, GAC Leadership, Topic Leads and GAC Support have developed an Operational Readiness Framework, together with supporting materials for GAC Member Early Warnings and for the consideration of possible GAC Advice. The Early Warning Guide and template have already been reviewed and approved by the GAC, while the broader operational framework and Advice approach are being finalized.

With Reveal Day now confirmed for 7 October, the focus is shifting from preparation to application review. Members will be able to begin reviewing applications and any replacement strings ahead of ICANN87, where the GAC expects to exchange preliminary observations and identify potential public policy issues. Following String Confirmation Day on 17 November, the GAC will move into the formal review period, including the 104-day GAC Member Early Warning window. Capacity-development sessions at ICANN87 are also intended to ensure that Members understand the available mechanisms, timelines and practical processes for engaging in the Round.

At the national level, preparations will naturally vary among GAC members, but may include coordination across relevant government agencies, raising awareness of the Round among domestic stakeholders, and engagement with potential applicants. The GAC's capacity-development efforts have also sought to support members in understanding the processes and tools available to them at the national level.

Questions from the GAC to the ICANN Board

1. DNS Abuse

What specific measures is the Board considering, within its remit and in coordination with ICANN org, the GNSO and contracted parties, to advance work on DNS Abuse gaps that do not require a full PDP, alongside PDP1 and PDP2? Provided the Board has identified any such measures, what steps does it plan to take to operationalize them?

2. Registration Data Accuracy / 15-day Verification Timeline

In light of the Board's 25 August 2026 letter identifying contractual negotiations and policy development as the two available mechanisms for modifying the 15-day verification timeline, and the Board's openness to considering other approaches (Board/GAC call, 16 July 2026), what steps could the Board envisage to accelerate progress, through these mechanisms or other avenues, while respecting the multistakeholder process?

3. SSAD / Urgent Requests

1. What outstanding issues must be resolved before the SSAD SRT's supplemental policy recommendations are ready for Board consideration?
2. Could the Board provide an update on the LEA Authentication Input Group, including progress on expediting authentication independently of the broader SSAD work and possible technical approaches to enabling the 24-hour urgent request response timeline?
3. When does the Board expect the Urgent Request obligations under the Registration Data Policy to take effect?

4. Privacy / Proxy Services

1. What does the Board feel registrars should be required to do when they receive disclosure requests through the RDRS or SSAD for privacy or proxy domains? Should it depend on whether the privacy or proxy service is affiliated with an accredited registrar?
2. In addition, the GAC would welcome any views on the ongoing work of the Privacy and Proxy Services Accreditation Issues Implementation Review Team, if the Board is following this process.

Further Information

- ICANN86 Sevilla Communiqué
- ICANN Action Request Registry of GAC Advice
- ICANN84 Dublin GAC Communiqué RIR governance and community involvement in recognition and derecognition.
- ICANN85 Mumbai GAC Communiqué: GAC observations on RIR governance.
- Recommended Draft RIR Governance Document (Version 3) — published 1 September 2026.
- Board letter on the 15-day verification timeline, 25 August 2026

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ICANN | GAC
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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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ICANN 87 ANNUAL GENERAL MEETING

GAC Meeting with the Country Code Names Supporting Organization (ccNSO)

Session 16

Contents

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Session Objective

To facilitate an interactive exchange between the GAC and ccNSO communities on a topic of common interest, fostering dialogue, knowledge sharing, and stronger engagement between GAC and ccTLD community members.

Session Agenda and Format

At ICANN87, the session will focus on the interaction between regulatory environments and ccTLD business continuity and disaster recovery (BC/DR) planning and practices, using an interactive World Café format.

Following a short introductory plenary, participants will engage in small-group discussions at four thematic stations reflecting different ccTLD operating contexts, including whether specific BC/DR regulatory frameworks are in place and whether ccTLD operations are managed primarily in-house or outsourced.

Participants will take part in two discussion rounds. The first will explore experiences and perspectives on BC/DR, including the respective roles of ccTLD managers and governments, the relevance of different governance models, and factors considered critical to effective BC/DR planning. The second will build on these exchanges to consider commonalities, gaps, emerging insights, and possible next steps.

Participants will be able to move between stations or remain at the same station to deepen the discussion. Key points from each station will then be shared with the full group, with the aim of

identifying practical insights that can contribute to strengthening ccTLD resilience and BC/DR capacity.

Background

The Country Code Names Supporting Organization (ccNSO) is a body within the ICANN structure created for and by ccTLD managers.

The ccNSO provides a platform to nurture consensus, technical cooperation and skill-building among ccTLDs and facilitates the development of voluntary best practices for ccTLD managers. The policy development process is managed by the ccNSO Council, which consists of 18 Councilors (15 elected by ccNSO members, three appointed by the ICANN Nominating Committee).

The GAC and ccNSO have been meeting, when deemed necessary, at ICANN Meetings in order to coordinate and discuss public policy issues of common interest.
The ccNSO appointed a new Liaison to the GAC, Sean Copeland, and the GAC appointed Ian Sheldon as the Point of Contact to the ccNSO. Their role is to facilitate policy and other internal community discussions among their groups and leaderships, while also preparing meeting agendas for joint sessions at ICANN Meetings.

Key Reference Documents

- Draft recommendations as presented by the Study Group at ICANN86: https://icann86.sched.com/event/2NQOy/ccnso-study-group-updates-and-consultations
  This session highlighted initial fact-finding themes showing that external recovery support must respect local manager autonomy.

Further Information

- ccNSO web site – https://www.icann.org/en/ccnso

The ccNSO Study Group on the IANA role in Disaster Recovery explores and advises on whether and how IANA should be involved in disaster recovery and business continuity for country code top-level domains (ccTLDs).

Background and Purpose

• Origin: Established following a recommendation by the ccNSO Policy Gap Analysis (PGA) Working Group in May 2025.

• Core Goal: Address concerns raised by IANA regarding its potential functions or limits during critical ccTLD outages or major disasters.

• Findings: business continuity and disaster recovery remain the sole responsibility of individual ccTLD managers.

Document Administration

Title	ICANN87 GAC Session Briefing - GAC Meeting with the ccNSO
Distribution	GAC Members (before meeting) and Public (after meeting)
Distribution Date	Version 1: 5 October 2026

ICANN | GAC
Governmental Advisory Committee

ICANN 87 ANNUAL GENERAL MEETING

ICANN87 Wrap Up

Session 17

Contents

Session Objective	p.#	Leadership Proposal for GAC Action	p.#	Current Status and Recent Developments	p.#	Key Reference Documents	p.#

Session Objective

the ICANN87 meeting week, including:

- Identify key substantive or operational follow-up arising from GAC sessions and bilateral meetings;
- Review upcoming deadlines and activities requiring GAC attention;
- Gather feedback and lessons learned from ICANN87 to inform planning for future GAC meetings; and
- Identify any issues that may need to be carried forward into the GAC's intersessional work or preparations for ICANN88.

Session Outline

Meeting Follow-Up and Next Steps

During the session, the GAC Chair and Vice Chairs may invite Members to identify priority follow-up activities arising from the meeting week. These could include actions resulting from GAC policy discussions, exchanges with other ICANN community groups or the ICANN Board, and any commitments or requests requiring further work by GAC Members, Topic Leads, Working Groups or GAC Support.

Where appropriate, the GAC Support Team will capture follow-up actions and relevant deadlines for tracking after ICANN87.

Public Meeting Feedback – Lessons Learned

Time permitting, GAC participants may be invited to provide brief feedback on the ICANN87 meeting experience, including the usefulness and format of GAC sessions, bilateral meetings, capacity-development activities and meeting preparation.

Feedback may help identify improvements for future GAC meeting planning and intersessional preparation.

Looking Ahead

As ICANN87 is the Annual General Meeting, the session also provides an opportunity to note immediate post-meeting priorities and the transition into the next GAC work cycle.

Particular attention may be given to:

- Priority activities requiring action before ICANN88, especially as it relates to the New gTLD Program.
- Upcoming deadlines;
- Any matters requiring continued attention from the incoming GAC Chair and Vice Chairs.

Further Information

- GAC Operating Principles
- GAC Strategic Plan
- GAC Annual Plan
- ICANN87 GAC Communiqué
- ICANN88 meeting information, when available

Document Administration

Title	ICANN87 GAC Session Briefing - Operational Planning
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ICANN87 GAC Schedule (as of 6-Oct-2026)

UTC	UTC+8	Sat, 17 Oct (Day 1)	Sun, 18 Oct (Day 2)	Mon, 19 Oct (Day 3)	Tue, 20 Oct (Day 4)	Wed, 21 Oct (Day 5)	Thu, 22 Oct (Day 6)	UTC+8
1:00	9:00	**1. GAC Opening Plenary** (60 mins)	**6. GAC Discussion on New gTLDs Next Round (2/2)** (60 mins)	**Welcome Ceremony and Tarek Kamel Award** (75 mins)	**11. GAC Discussions on NxR** (60 mins)	**15. GAC Meeting with the CPH** (60 mins)	**13 (f). GAC Communique** (60 mins)	9:00
1:15	9:15							9:15
1:30	9:30							9:30
1:45	9:45							9:45
2:00	10:00	Break (30 mins)	Break (30 mins)		Break (30 mins)	Break (30 mins)	Break (30 mins)	10:00
2:15	10:15			Break (30 mins)				10:15
2:30	10:30	**2. GAC Capacity Development (1/2) GAC readiness for Next Round** (90 mins)	**7. GAC Discussion on WHOIS Registration Data Issues** (90 mins)	**Community Session (1/2) Building a Secure, Inclusive, and Multilingual Internet for the Next Decade** (75 mins)	**12. GAC Discussion on DNS Abuse Mitigation** (90 mins) **- incl. JPMAC / OCTO**	**16. GAC Meeting with the ccNSO** (90 mins)	**ICANN Public Forum** (90 mins)	10:30
2:45	10:45							10:45
3:00	11:00							11:00
3:15	11:15							11:15
3:30	11:30							11:30
3:45	11:45							11:45
4:00	12:00	Lunch Break (75 mins)	Lunch Break (75 mins)	Lunch Break (75 mins)	Lunch Break (75 mins)	Lunch Break (75 mins)	Lunch Break (75 mins)	12:00
4:15	12:15							12:15
4:30	12:30							12:30
4:45	12:45							12:45
5:00	13:00							13:00
5:15	13:15							13:15
5:30	13:30	**3. GAC Capacity Development (2/2) GAC readiness for Next Round** (75 mins)	**8. GAC Operations Session** (75 mins)	**Community Session (2/2) The Gap in Registrant Recourse - Next Steps** (75 mins)	**13 (a). GAC Communique** (75 mins)	**13 (c). GAC Communique** (75 mins)	**13 (g). GAC Communique** (75 mins) **or** **17. Wrap-Up**	13:30
5:45	13:45							13:45
6:00	14:00							14:00
6:15	14:15							14:15
6:30	14:30	Break (30 mins)	Break (30 mins)	Break (30 mins)	Break (30 mins)	Break (30 mins)	Break (30 mins)	14:30
6:45	14:45							14:45
7:00	15:00	**4. GAC Discussion on New gTLDs Next Round (1/2)** (60 mins)	**9. GAC Meeting with the GNSO Council** (60 mins)		**14. GAC Meeting with the ICANN Board** (60 mins)	**13 (d). GAC Communique** (60 mins)	**Geopolitical Forum** (60 mins)	15:00
7:15	15:15							15:15
7:30	15:30							15:30
7:45	15:45							15:45
8:00	16:00	Break (30 mins)	Break (30 mins)	Break (30 mins)	Break (30 mins)	Break (30 mins)	Break (30 mins)	16:00
8:15	16:15							16:15
8:30	16:30	**5. GAC UA-IDN WG** (60 mins)	**10.GAC Meeting with the CSG** (60 mins)	**Q&A with ICANN Org Executive Team** (60 mins)	**13 (b). GAC Communique** (60 mins)	**13 (e). GAC Communique** (60 mins)	**ICANN Board Meeting** (60 mins)	16:30
8:45	16:45							16:45
9:00	17:00							17:00
9:15	17:15							17:15
9:30	17:30						**Closing Cocktail** (60 mins)	17:30
9:45	17:45							17:45
10:00	18:00							18:00
10:15	18:15							18:15
10:30	18:30							18:30
10:45	18:45							18:45
11:00	19:00							19:00

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

Official Times for ICANN87
09:00-17:30