

**GAC ICANN84 Dublin Communiqué: Issues of Importance (03 November 2025) - ICANN Board Comments for Board-GAC Interactions Group (BGIG) Call**

Version 1.3

Updated (6 January 2026)

**Issues of Importance**

The table below contains the Board’s comments related to the [GAC ICANN84 DUBLIN Communiqué](#), in support of the BGIG Meeting @ 12 January 2026. **This scorecard will not be presented to the Board for resolution.**

Issue Title	Issue Text <i>(from Communiqué)</i>	ICANN Board Comments
<p><b>1.a. Next Round of New gTLDs: Applicant Support Program Implementation and New gTLD Next Round Outreach</b></p>	<p>The GAC recognizes that the Applicant Support Program (ASP) is meant as a key instrument, intended to enable applicants from underserved regions and economies to participate in the Next Round of new gTLDs.</p> <p>While acknowledging a significant increase in applications in the pipeline since ICANN83, the GAC notes the limited number of applications and geographic imbalance in the ASP. Despite extensive outreach efforts by ICANN and stakeholders in a spread of regions, the number of completed applications remains lower than expected. The current low uptake and limited geographic breadth poses a risk to the credibility of the program. It may impact the overall objective of the Next Round of new gTLDs to further diversify and broaden the global base of the domain name system (DNS).</p> <p>The GAC requests ICANN to follow-up on its commitment to facilitate communication between applicants and their respective government through sharing the GAC Representative’s contact details. This will help interested governments to better assist applicants in their country to move through the ASP.</p> <p>The GAC recognizes the efforts by ICANN Org to support ASP applicants in the process and the extension of the deadline to finalize those applications that are in the pipeline. Given the low number of expected complete applications, the GAC considers it important that an adequate ex post analysis is performed to identify problems and provide input to improve any future programs of a similar nature beyond the 2025 ASP.</p> <p>The GAC appreciates a dialogue with ICANN org to ensure outreach on the Next Round can help in improving global diversity of the DNS sector and encourage applications from underserved regions.</p>	<ul style="list-style-type: none"> <li>● The Board thanks the GAC for its continued interest in and advocacy for the Applicant Support Program (ASP). The Board shares the GAC’s strong commitment to the success of the ASP and its goal to foster diversity, encourage competition, and enhance the utility of the DNS.</li> <li>● The Board notes that as of ICANN84, the total number of active applications in the ASP pipeline was 135. The Board also notes that as of ICANN84, of the active applicants in the ASP pipeline with location information provided, there were applications from all 5 ICANN regions representing 33 countries or territories.</li> <li>● The Board understands from ICANN org staff and presentations during ICANN84<sup>1</sup>, that ICANN org staff has been proactively reaching out to applicants in the ASP pipeline to support progress in their applications. The Board is aware that in addition to the weekly outreach ICANN org staff is doing to support applicants in the ASP pipeline, ICANN org staff is conducting continuous monitoring and evaluation work which includes a survey to ASP applicants to better understand where they are facing challenges.</li> <li>● The Board understands that by the 19 December deadline to submit applications, a total of 75 ASP applications were received with 10 applications from Africa, 38 from the Asia Pacific region, and 1 from Latin America and the Caribbean, as well as 6 from Europe and 20 from North America. With respect to the geographic breadth of applications, the Board understands that ICANN org staff hosted or participated in 456 New gTLD Program related events taking place across all ICANN regions in 71 different countries or territories, with distribution concentrated in Africa, Latin America and Caribbean, and Asia-Pacific regions<sup>2</sup>. This aligns with the implementation guidance in the GNSO Guidance Process for Applicant Support:             <ul style="list-style-type: none"> <li>○ <i>Target potential applicants from the not-for-profit sector, social enterprises and/or community organizations from under-served and developing regions and countries. This should not exclude any entities from outreach efforts, such as private sector entities from underserved and developing regions and countries, recognizing the goal is to get as many qualifying applicants as possible.</i></li> </ul> </li> <li>● The Board invites the GAC to share insights as to the challenges that potential ASP applicants face from their countries or territories.</li> <li>● The Board would like to better understand the GAC’s concern around the number of completed applications being “lower than expected”. The Board notes the GNSO Guidance Process was tasked with defining ASP metrics for success as a follow-on to the SubPro Final Report outputs on the topic of Applicant Support. In terms of targets, GGP Guidance Recommendation 5 states:             <ul style="list-style-type: none"> <li>○ <i>Of all successfully delegated gTLD applications, the goal is that a certain percentage of them should be from supported applicants*. No fewer than 10, or 0.5 percent (.005), of all successfully delegated gTLD applications were from supported applicants.</i></li> </ul> </li> <li>● The Board notes that at this stage it is too early to tell whether the ASP has met these metrics, but it is pleased to see that there has been increased activity for ASP applicants in the pipeline since ICANN83, as reflected in the <a href="#">December 2025 ASP statistics</a> as well as final submission numbers (see <a href="#">blog post</a>).</li> <li>● Regarding the GAC’s follow up on the sharing of GAC Representatives’ contact details, the Board understands that during ICANN84 ICANN staff sent a message to the GAC offering to collect contact information. As of 12 November 2025, the</li> </ul>

<sup>1</sup>See: [New gTLD Program: Next Round Implementation Status Update](#), [GAC: Discussion on New gTLD Program Next Round \(1/2\)](#), [GDS: Subsequent Procedures IRT \(5 of 6\)](#) and [GNSO: NCSG Wrap-Up](#).

<sup>2</sup> See [Comprehensive Report on Prospective and Pipeline Applicants](#)

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		<p>Board understands that 4 GAC members have submitted their contact information, which has been added to the <a href="#">List of Pro Bono Service Providers and Mentors</a> on the <a href="#">ASP Resources webpage</a>.</p> <ul style="list-style-type: none"> <li>● Regarding the GAC’s suggestion for an ex post analysis of the ASP, the Board understands that such an evaluation is currently ongoing as a part of the ASP’s continuous monitoring and evaluation work which was <a href="#">presented to the GAC during ICANN82</a>. In alignment with <a href="#">GGP Final Report</a> recommendations, this effort will explore various aspects of the program: <ul style="list-style-type: none"> <li>○ Communications and outreach</li> <li>○ ASP program development</li> <li>○ The ASP application system</li> <li>○ Capacity development resources, pro bono services, and the Applicant Counselor</li> </ul> </li> <li>● The Board understands that all applicants that have been through the ASP process will receive a survey as a part of this research, and that this continuous monitoring and evaluation will provide insights into supported applicants’ journey throughout the ASP and gTLD application lifecycle to inform future policymaking and iterations of the ASP.</li> <li>● The Board welcomes the idea of a dialogue between the GAC and ICANN org on outreach on the Next Round and invites the GAC to coordinate with ICANN org staff to schedule a meeting.</li> </ul>
<p><b>1.b. Next Round of New gTLDs: Additional Fee for Evaluation of Geographic Names During the Next Round of New gTLDs</b></p>	<p>With respect to the evaluation of Geographic Names (section 6.5 of the AGB), recalling the GAC input to the public comment related to the draft Applicant Guidebook (AGB) filed on July 23rd 2025, the GAC expects clarifications with regard to the justification for the introduction of additional fees in comparison to the 2012 round where a similar procedure was in place.</p> <p>In addition, the GAC is of the opinion that the AGB text as proposed introduces some ambiguity in the role of the Geographic Names Panel (GNP) and the application of the fees associated with their conditional review. The GAC recalls its concerns with the text on this topic, and finds that an additional fee should only apply in exceptional cases, excluding the general case where the authenticity of supporting documents can be confirmed by the relevant GAC representative as described in the relevant section of the AGB.</p>	<ul style="list-style-type: none"> <li>● The Board notes that although there was no separate fee in 2012, this did not mean there were no costs associated with the Geographic Names Review - these costs were paid for by all applicants through the gTLD evaluation fee, instead of only those making use of this evaluation.</li> <li>● As the Org team communicated from the outset, in line with the cost recovery nature of the program, there are a number of conditional evaluations that an applicant may elect or are required to undergo to obtain a specific status or exemption for which a separate fee would be required. The Geographic Names Review has been part of that set of conditional evaluations from the start (see, for example, the gTLD evaluation fee <a href="#">presentation</a> to the IRT in June 2024).</li> <li>● For clarity, the initial review of all applications to determine whether they involve a geographic name takes place during the string evaluation stage and is included in the gTLD evaluation fee. If the applicant does not intend to apply for the string as a Geographic Name (e.g. the string matches a city name but is being used for another purpose) this review is the only step required and no conditional fee applies.</li> <li>● The conditional fee applies only when an application is confirmed to be for a Geographic Name and the applicant intends to use the string as representing a city, region, or other geographic term as detailed in Section 7.5 of the AGB. At this stage, the Geographic Names Panel, will perform the following activities: <ul style="list-style-type: none"> <li>○ The evaluation panel reviews the geographic names portion of the associated applications which includes: <ul style="list-style-type: none"> <li>■ application responses (self-designation, intended use of the string, rationale for selecting the government or public authority, etc.),</li> <li>■ application attachments (Letters of Support or Non-Objection),</li> <li>■ relevant public comments, and</li> <li>■ GAC Early Warning documentations.</li> </ul> </li> <li>○ The evaluation panel may request applicants to provide the necessary documentation for approving a geographic name gTLD.</li> <li>○ The evaluation panel may verify the authenticity of the documentation through research, diplomatic channels, or through the Governmental Advisory Committee (GAC) in the Application Evaluation stage. This would also include research on whether this is the most relevant authority, are there other authorities, etc.</li> <li>○ The evaluation panel records and provides results.</li> </ul> </li> <li>● Per the AGB, “the Geographic Names Panel will determine which governments or public authorities are relevant based on the inputs of the applicant, governments, and its own research and analysis”. Confirmation from a GAC representative may facilitate this process, but it cannot replace it.</li> </ul>

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		<ul style="list-style-type: none"> <li>Following the review of responses received to the RFI and in order to provide certainty to applicants, a “will not exceed” fee has been set at USD 12,000. An applicant will not pay more than this fee, and may pay less if a lower fee is agreed with the vendor that is chosen to perform the Geographic Names Review.</li> <li>As part of the Request for Proposal (RFP) process, ICANN org will review with the vendor whether there are ways in which costs can be reduced and/or whether differentiated pricing is an option in case an applicant is able to provide information that facilitates the authentication process.</li> </ul>
<b>1.c. Next Round of New gTLDs: Latin Script Diacritics</b>	<p>The GAC understands that a dedicated Policy Development Process (PDP) on Latin script diacritics is underway to develop policy for gTLD strings that include diacritical marks and have ASCII-equivalent applications, reflecting how many Latin-script languages are written. Despite the PDP’s progress, the GAC has learned that the PDP will not be completed in time to include its outcomes in the Applicant Guidebook (AGB). The GAC is of the view that the recommendations of this PDP should be part of the conditions governing the Next Round of New gTLDs.</p> <p>The GAC understands that there may be viable solutions to resolve this issue without delaying the launch of the Next Round whilst providing proper notice to prospective applicants. The GAC requests the Board to work with the GNSO to ensure the integration of PDP recommendations into the application and evaluation processes of the Next Round of New gTLDs.</p>	<ul style="list-style-type: none"> <li>The ICANN Board appreciates the GAC’s suggestion to work with the GNSO on the topic of Latin script diacritics but notes that the GNSO Council decided to initiate a PDP on this topic, with the specific notion that “The completion of this PDP is not a dependency for the launch of the application process for new gTLDs. The outputs of this PDP will be governed by the terms of Sub Pro Recommendations 3.6 and 3.7” (see <a href="#">motion</a> on the initiation of the PDP). <ul style="list-style-type: none"> <li>Recommendation 3.6: Absent extraordinary circumstances, future reviews and/or policy development processes, including the next Competition, Consumer Choice &amp; Consumer Trust (CCT) Review, should take place concurrently with subsequent application rounds. In other words, future reviews and/or policy development processes must not stop or delay subsequent new gTLD rounds.</li> <li>Recommendation 3.7: If the outputs of any reviews and/or policy development processes has, or could reasonably have, a material impact on the manner in which application procedures are conducted, such changes must only apply to the opening of the application procedure subsequent to the adoption of the relevant recommendations by the ICANN Board.</li> </ul> </li> <li>Per the GNSO’s Policy Development Process, the ICANN Board can only act on recommendations once these have been adopted by the GNSO Council. In other words, the “integration of PDP recommendations into the application and evaluation processes” cannot happen until and unless the GNSO Council-approved Latin Script Diacritic PDP recommendations are subsequently adopted by the ICANN Board.</li> <li>The ICANN Board would be open to hearing from the GAC what viable solutions it has identified to resolve this issue without delaying the launch of the 2026 Round, but it is the Board’s understanding that the recommendations currently contemplated by the PDP Working Group are for a similar treatment as is currently in place for applied-for variant strings. These contemplated recommendations would require non-trivial updates or changes, for example, to the Applicant Guidebook, the Registry Agreement (for example, a new specification, as is the case with variants), the TLD Application Management System (TAMS), as well as the various processes and procedures in the New gTLD Program.</li> <li>The Board understands that the Latin Script Diacritics PDP Working Group is still in process developing its preliminary recommendations, and the estimated timeline for GNSO Council’s consideration of the finalized PDP recommendations is August-November 2026 (the PDP Initial Report has not yet been published for Public Comment).</li> <li>The Board acknowledges the input received from the GNSO Council on this particular Issue of Importance, which reinforced the Council’s expectations in chartering the LD PDP in 2024, that its recommendations would not be available for the immediate Next Round (i.e. the 2026 Round), and should not serve as a dependency for the 2026 Round.</li> <li>The Board recognizes that there are less than six months remaining until the planned opening of the application submission period. If staff’s attention is redirected to integrate recommendations related to Latin script diacritics -- which have not yet been finalized by the PDP working group or adopted by the GNSO Council -- into the application and evaluation processes of the Program, this will bypass the policy process in the ICANN Bylaws, deviate from the original intent of the GNSO Council when it initiated this PDP, and delay the current timeline for launching the 2026 Round.</li> <li>If there are viable solutions that the GAC has identified, the Board encourages the GAC to share these with the GNSO Council, and the Board of course stands ready to discuss these with the GNSO Council, as appropriate.</li> </ul>
<b>1.d. Next Round of New gTLDs:</b>	The GAC takes note of ongoing discussions in the Subsequent Procedures Implementation Review Team and GNSO Council concerning the inclusion of	<ul style="list-style-type: none"> <li>The GNSO Council passed a <a href="#">resolution on 13 November 2025</a>, clarifying “that the intent of the Applicable Recommendations is only to ensure that no organization other than the protected organization can apply for the exact</li> </ul>

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<b>IGO Protections</b>	<p>reserved Intergovernmental Organizations (IGO) identifiers in the scope of String Similarity Evaluation in the Next Round of New gTLDs, in which applied-for strings are evaluated for string similarity against the list of reserved strings. The GAC takes note of letters from the ICANN Board and the ALAC to the GNSO Council supporting this inclusion.</p> <p>Against the backdrop of the GNSO policy recommendations for the introduction of new gTLDs<sup>3</sup> that applied-for strings must not be confusingly similar to a reserved name, and must not infringe existing legal rights, and the <i>2007 GAC Principles regarding New gTLDs</i> that the introduction of new gTLDs<sup>4</sup> must make proper allowance for rights in the names and acronyms of IGOs, the GAC continues to monitor this evolving topic, and anticipates further discussions and contributions following the ICANN84 Dublin Meeting.</p>	<p>match of the specific, protected identifier associated with that organization.” The Council further noted that “the relevant identifiers [protected strings] shall <b>not</b> [emphasis added] be included in the String Similarity Evaluation in the New gTLD Program and such a relevant identifier shall not operate as a bar to an application by another applicant for a string that could be considered potentially confusingly similar during that evaluation.”</p> <ul style="list-style-type: none"> <li>● In its resolution, the Council indicated that it would “support and encourage” the following: <ul style="list-style-type: none"> <li>○ First, the application process must “prominently display and clearly communicate the Reserved Names list” so applicants understand it before choosing a string. <i>ICANN Org Notes that this will be included in the AGB.</i></li> <li>○ After String Confirmation Day, Org should “contact the relevant protected organizations” to alert them to any applied-for strings that may be “confusingly similar” and to ensure they are aware of their options to file a formal Objection or seek GAC support. <i>ICANN org notes that this proposed action could present difficulties because string similarity is not an algorithmic process. Therefore ICANN org cannot evaluate string similarity without an expert panel. ICANN proposes to provide the list of applied-for strings to the GAC as well as links to the reserved names, to enable the GAC to assess possible concerns about any applied-for strings.</i></li> <li>○ Org should also “contact the GAC” so its members may consider whether “Early Warning(s) or GAC Consensus Advice would be appropriate.” <i>ICANN org notes that the GAC will be informed when the Early Warning Window opens (and closes), and that GAC advice can be issued at any point, in accordance with the Bylaws.</i></li> </ul> </li> <li>● <i>ICANN Org plans to take the actions detailed below that relate to the GNSO Council’s comments in its resolution, as follows:</i> <ul style="list-style-type: none"> <li>○ The Council further “encourage[s] the GAC to contact the relevant protected organizations” so they can decide whether to pursue any challenge mechanism in the AGB. Org should also “notify the applicant of the confusingly similar string, and give them the option to withdraw for an appropriate refund.” The Council notes that existing “procedures... under the AGB and ICANN Bylaws” already govern how applications are handled when objections are filed or GAC advice issued.</li> <li>○ The Council “recommends that the IRT and Org consider including a provision” in the AGB stating that ICANN will notify the GAC and protected organizations of any relevant applied-for strings. Should the Board consider a policy review timely, the Council invites the Board to “request an issues report,” assuming that Org would again be instructed to take appropriate steps to safeguard Reserved Names pending the conclusion of such work.</li> <li>○ Finally, the Council “requests that its liaisons to the SubPro IRT provide this information to the implementation staff and IRT.”</li> </ul> </li> <li>● ICANN org will make updates to the AGB that reflect the above resolution, and will work with the Implementation Review Team (IRT) to ensure that the final text reflects the Council’s guidance.</li> <li>● The Board notes the GNSO Council’s encouragement for ICANN org to notify the GAC and relevant organizations should there be any applications for potentially confusingly similar strings. In view of ICANN org’s planned actions as described above, the Board expects that it will inform the GAC following string confirmation day of the list of applied-for strings along with the relevant list of all reserved names so that the GAC and relevant organizations can take any action based upon the list as needed.</li> </ul>

<sup>3</sup> [Policy recommendations for the introduction of new gTLDs](#) (8 Aug. 2007) adopted by the ICANN Board (26 Jun. 2008)

<sup>4</sup> GAC Principles Regarding New gTLDs (28 March 2007): <https://gac.icann.org/contentMigrated/gac-principles-regarding-new-gtlds>

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<b>2. Community Statements of Interest (SOI)</b>	The GAC welcomes the recent adoption by the Board of the ICANN Community Participant Code of Conduct Concerning Statements of Interest, looks forward to a swift and efficient implementation of its provisions, and would welcome regular updates on its application and effects.	<ul style="list-style-type: none"> <li>• The Board thanks the GAC for its support of the work to foster a culture of trust, transparency, and mutual respect, and facilitate ethical participation in ICANN’s policymaking activities. Along with the ICANN Expected Standards of Behavior and Anti-Harassment Policy, the ICANN Community Participant Code of Conduct is part of ICANN’s Community Ethics Policy. Implementation of the Code has begun, through publication on the ICANN website and inclusion in all ICANN org’s staff announcements when conducting a community policy session, beginning with the ICANN84 Public Meeting in Dublin, Ireland. ICANN org has begun working with community leaders to evaluate each Supporting Organization’s and Advisory Committee’s policies and procedures, to ensure that these are updated as necessary to reflect the provisions of the Code.</li> </ul>
<b>3. ICANN Review of Reviews</b>	The GAC recalls the essential character of the ICANN Reviews as mandated by the Bylaws and their central role for the well-functioning of ICANN’s accountability, transparency, and governance. Accordingly, the GAC stresses the importance of the Review of Reviews to address the concerning challenges in the current system for accountability at ICANN <sup>5</sup> , not least regarding the backlog of recommendations. The GAC expects to engage actively in this effort to ensure future reviews are efficient, effective, and aligned with ICANN’s commitments to transparency and accountability.	<ul style="list-style-type: none"> <li>• The Board agrees that reviews have been foundational to upholding ICANN’s accountability and transparency. The Board has asked James Galvin and Leon Sanchez to serve on the Reviews Cross Community Group effort as part of the Board’s active involvement in this community dialogue. The Board shares the GAC’s continuing expectation for this work to produce a reliable and effective model that increases efficiencies and aligns with community needs and the maturity of ICANN.</li> <li>• The Board has appreciated the GAC’s interest and support to advance the dialogue on the fundamental purpose of Reviews and the exchanges with the GAC on this Issue of Importance in the Prague communiqué and forward. The Board has a standing agenda item in its workshop sessions on this topic and is actively following discussions.</li> <li>• The Board thanks the GAC for its participation in the Reviews CCG and looks forward to further engaging with the community on this important topic at ICANN85.</li> </ul>
<b>4. DNS Abuse</b>	<p>During ICANN84, the GAC confirmed a two-pronged approach to its work on DNS Abuse, focusing on: 1) advancing policy progress, and 2) developing the capacity of GAC members on the subject. Regarding policy, the GAC notes that the 2024 DNS Abuse contract amendments served as an important first step, but more must be done to address the problem. Phishing, botnets, malware, and other forms of DNS abuse impose a tremendous cost upon the public, and adding new strings to the internet will increase the surface area for bad actors to perform these attacks. To prepare for this, the ICANN community must work together to ensure that sound and effective policies are put in place before the delegation of new strings.</p> <p>On this note, recalling its ICANN83 Advice to the ICANN Board<sup>6</sup>, the GAC recognizes the extensive efforts made by the ICANN community, prior to ICANN84, to proactively initiate DNS Abuse policy work. Swift progress should continue.</p> <p>In its submission to the ICANN Public Comment proceeding on the Preliminary Issue Report<sup>7</sup>, the GAC notes that “<i>the Issue Report prioritizes the issues specified for policy development</i>” while appreciating that it “<i>also identifies and explains a</i></p>	<ul style="list-style-type: none"> <li>• The ICANN Board welcomes the GAC’s input and support to seek practical and meaningful solutions to address DNS Abuse. The Board notes the GAC’s two-pronged approach to its work on the topic.</li> <li>• On the noted aspect of advancing policy progress, the Board acknowledges the extensive efforts by the community, especially the GNSO, and ICANN org, and is encouraged by the momentum that has been built for this important topic. The Board is glad to acknowledge the delivery of the GNSO’s Final Issue Report on DNS Abuse, recognizing how important this report will be in guiding the GNSO Council on how to pursue DNS Abuse mitigation related policy development.</li> <li>• The Board understands the community’s emphasis on narrowly focused PDPs, ideally leading to rapid and effective outcomes. This emphasis means that certain topics will need to be prioritized. However, rapid and effective PDPs will hopefully create the necessary space to seek further mitigations against DNS Abuse.</li> <li>• When the GNSO Council initiates PDPs, the Board understands that a number of factors are considered when determining which type of PDP membership model is most appropriate. As communities beyond the GNSO are always invited to participate in PDPs, we would encourage the GAC to engage with the GNSO to best ensure that the membership model it chooses aligns with, to the extent possible, the GAC’s participation needs.</li> <li>• The Board also appreciates the GAC’s perspectives on additional issues beyond those that could be targeted by the Issue Report. The Board agrees that there will remain subsequent areas for discussion by the community, both within and extending beyond the realm of policy development. This could include consideration of the suggestions noted by the GAC, such as enhanced data reporting requirements and standardization, as well as other potential initiatives within ICANN’s remit.</li> </ul>

<sup>5</sup> As discussed in Issues of Importance to the GAC in the [GAC Prague Communiqué](#) (16 June 2025)

<sup>6</sup> See section V.1.a p.11 of the [GAC Prague Communiqué](#) (16 June 2025)

<sup>7</sup> [Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation](#)

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	<p><i>variety of additional “policy gaps” underlying DNS Abuse within ICANN’s remit” many of which are of high importance for the GAC<sup>8</sup>.</i></p> <p>During ICANN84 the GAC discussed participation in upcoming policy development work, including the need for the charter to recognize GAC alternates to enable the GAC to participate effectively. The GAC also noted with interest a point raised during discussion that there are different ways to automate the registration of a large number of domain names, and therefore policies should be effective while remaining technologically neutral.</p> <p>Additional policy issues outside of those targeted by the PDPs were discussed, including the absence of an obligation for the contracted parties to report on the abuse notices they receive and act upon. Without this data, the impact of the contract amendments on DNS Abuse, as well as the role of compliance in enforcing these new obligations, cannot be accurately measured.</p> <p>Further, the GAC supports ICANN providing DNS abuse contract compliance data in standardized, open, machine-readable formats, in order to support evidence-based policy development and enforcement.</p> <p>The GAC continues to prioritize the commencement of policy development. At the same time, the GAC will follow efforts to address the additional gaps raised by the Preliminary Issue Report, all of which should ensure that critical DNS abuse vectors are effectively mitigated.</p> <p>In its dedicated session on DNS Abuse at ICANN84, the GAC welcomed a presentation by the host country ccTLD (.ie) on designing effective policy, as well as TWNIC and DotAsia on their innovative trusted notifier network. The GAC recognizes the importance of stakeholder collaboration to address DNS abuse activity that is both within and outside of ICANN’s remit and considers voluntary initiatives such as trusted notifier programs to be promising in this regard.</p>	<ul style="list-style-type: none"> <li>○ ICANN Org continues to do its part in identifying and pursuing opportunities for continuing enhancement of enforcement and reporting tools regarding existing requirements. This includes both educational and enforcement tools for contracted parties, as well as resources for anyone who wishes to report potential noncompliance to ICANN. One recent example is the <a href="#">Submitting DNS Abuse Complaints to ICANN: A Step-by-Step Guide</a>, published in all UN languages and Portuguese, which explains where and how to report DNS Abuse and outlines how to submit a well-founded complaint to ICANN.</li> <li>○ ICANN Compliance is preparing to release its reports on the enforcement of DNS Abuse mitigation requirements in an open, raw-data format in the coming weeks. This will enable users to extract maximum value from the information without being limited to predefined views or reports. The files will include the underlying data used to generate the charts and tables published by ICANN Contractual Compliance, which will continue to be published as well. However, it is important to note that while this is a valuable data source, ICANN Compliance’s metrics alone cannot be used to measure the overall impact of the DNS Abuse Amendments. Compliance has visibility into instances of DNS Abuse that are the subject of Compliance cases, but not the full DNS marketplace or how contracted parties and other ecosystem actors address DNS Abuse. As a result, Compliance data should be considered alongside other datasets that capture broader and more nuanced metrics across the global gTLD domain name marketplace, including <a href="#">ICANN Domain Metrics</a> and other third-party sources. The Board concurs with the observed gaps in reporting scope and standardization and note these as potential areas for future deliberation by the community.</li> <li>● With respect to enhancing the capacity of GAC members on DNS Abuse-related issues, ICANN Org will remain ready to offer support upon request for relevant expertise by the GAC.</li> </ul>
<p><b>5.a. Domain Registration Data: Urgent Requests for Disclosure of Registration Data</b></p>	<p>Registries and registrars should be required to provide a swift determination and response to Urgent Requests for disclosure of registration data in circumstances that pose an imminent threat to life, of serious bodily injury, to critical infrastructure, or of child exploitation. The GAC notes action is still pending on its Advice in the ICANN79 San Juan Communique and its Follow-Up on Previous Advice in the ICANN80 Kigali Communique regarding the expeditious establishment of a policy on Urgent Requests for disclosure of domain name registration data<sup>9</sup>. The GAC reiterates the importance of ongoing work on Urgent Requests in the two parallel tracks previously agreed by the GAC, the ICANN Board and the GNSO Council.</p>	<ul style="list-style-type: none"> <li>● The Board shares the GAC’s view on the importance of the community work on this topic in the two tracks proposed by the GAC.</li> <li>● The Board agrees with the GAC’s position that there should be swift determination and response to Urgent Requests for disclosure of registration data, recognizing that the contracted party makes the determination to disclose or not disclose, according to the circumstances of each specific request.</li> <li>● The Board appreciates the GAC’s satisfaction with the progress of the Registration Data Implementation Review Team (IRT) on establishing a timeline for Urgent Requests and welcomes the GAC’s input in the Public Comment proceeding on draft policy text for Urgent Requests. The Board notes that action on GAC advice from ICANN79 and ICANN80 is expected to be addressed through the finalization of Urgent Request policy language following an analysis of community input from the Public Comment proceeding.</li> </ul>

<sup>8</sup> See [GAC Comments on the Amendments to the Base gTLD Registry Agreement \(RA\) and Registrar Accreditation Agreement \(RAA\) to Modify DNS Abuse Contract Obligations](#) (17 July 2023)

<sup>9</sup> See GAC Consensus Advice to the ICANN Board on Urgent Requests for Disclosure of Registration Data in section V.2.a p.14 in the [GAC San Juan Communique](#) (11 March 2024)

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	<p>The GAC expresses satisfaction with the progress achieved by the Registration Data Implementation Review Team (IRT) in the policy track on establishing a timeline to respond to Urgent Requests. The GAC notes 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 GAC intends to provide a submission to the recently opened ICANN Public Comment proceeding on the draft text for the Urgent Requests section of the Registration Data Policy, given the importance of this issue to the GAC. After the Public Comment proceeding, the GAC urges swift action to finalize the timeline. The timeline must be uniformly followed by the Contracted Parties to be fit for purpose based on the urgent scenarios involved. The GAC also suggests that support for Urgent Request submission should be integrated within the RDRS to optimize usage of resources.</p> <p>In the authentication track, the GAC welcomes the update it received from the PSWG regarding its ongoing efforts through the Practitioners Group to develop technical mechanisms to authenticate the identities of law enforcement requestors submitting Urgent Requests. The GAC does not believe new policy development is needed to allow for Urgent Requests to utilize the authentication mechanisms being developed by the PSWG for law enforcement requestors. Instead, usage of these mechanisms should be considered part of the implementation process for the existing Registration Data Policy. In this respect, the GAC appreciated the ICANN Board’s statement during the bilateral meeting at ICANN84 that authentication mechanisms could be incorporated with no new policy development. The GAC encourages the Board and the GNSO Council to work together to identify the most effective path to swiftly integrate outcomes from the PSWG’s work on authentication mechanisms in the policy on Urgent Requests. Since the authentication mechanisms are needed for the implementation of Urgent Requests policy, and those mechanisms are expected to require technical interfacing with ICANN systems, the GAC continues to appreciate the participation of ICANN staff and community members in the PSWG’s Law Enforcement Authentication Practitioners Group. The GAC supports the PSWG’s efforts and urges the necessary parties to continue prioritizing this work.</p>	<ul style="list-style-type: none"> <li>• The Board acknowledges the GAC’s support for the integration of Urgent Request submissions with RDRS and notes that this will be included in conversations for next steps following the public comment proceeding.</li> <li>• The Board understands the GAC’s position that authentication mechanisms should be part of implementation and agrees that the most effective path for swift integration should be identified to integrate outcomes of the PSWG’s work on this. The Board looks forward to understanding the community’s input on whether additional policy work on authentication mechanisms, i.e. policy surrounding the use of an authentication mechanism, is needed or if the community believes that authentication mechanisms should simply be considered as part of implementation.</li> </ul>
<b>5.b. Domain Registration Data: Registration Data Request Service (RDRS)</b>	<p>The GAC is of the view that ICANN should maintain a permanent and centralized mechanism to channel domain registration data requests to registrars, and registrar participation should be mandatory to ensure the usefulness of the mechanism for requestors. This mechanism should also require participation by privacy and proxy services affiliated with registrars. The GAC calls 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.</p>	<ul style="list-style-type: none"> <li>• The Board appreciates the GAC’s submission to the recent Public Comment proceeding for the RDRS Standing Committee’s <a href="#">Final Report</a> and looks forward to discussing the report with the GNSO Council.</li> <li>• The Board adopted a <a href="#">resolution</a> during ICANN84 directing ICANN to continue RDRS operations for up to two additional years following the end of the RDRS pilot. Concurrently, ICANN <a href="#">published</a> the RDRS Policy Alignment Analysis for Public Comment, which the Board requested during ICANN83 to determine which envisioned enhancements to RDRS would require new policy development and which enhancements could be completed based on existing recommendations or policies. The analysis outlines options for aligning 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 with the Board and community’s requested enhancements for RDRS or successor system. The feedback received on the</li> </ul>

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	<p>The GAC provided a submission to the recent Public Comment proceeding outlining its views on the final report of the RDRS Standing Committee. In this submission, the GAC supported the continuation of the RDRS after the end of its two-year pilot period, its improvement to address the needs of requestor communities, and efforts to encourage participation by all registrars since the system is currently voluntary. To that end, the GAC welcomes the Board’s decision to adopt a resolution enabling the continued operation of the RDRS. The GAC also understands the Board intends to issue a policy alignment analysis for public consultation, outlining next steps needed to achieve the Board’s vision for the RDRS. The GAC intends to closely review this analysis document and will consider making a submission to the Public Comment proceeding regarding the analysis, noting that the analysis document will address the future of the RDRS more holistically than the RDRS Standing Committee report. The GAC urges the ICANN Board to prioritize further actions on this issue after the Public Comment period on the policy alignment analysis. The GAC continues to support efforts to explore voluntary participation by ccTLDs in the RDRS.</p>	<p>analysis will help inform discussions between the Board and the GNSO Council in assessing how to proceed with the consensus policy recommendations for an SSAD.</p> <ul style="list-style-type: none"> <li>• The Board welcomes the GAC’s input on the <a href="#">RDRS Policy Alignment Analysis</a> as well and looks forward to reviewing all public comments on the analysis in January 2026.</li> <li>• The Board also notes that ICANN will continue to work on enhancements to the service in consultation with the Generic Names Supporting Organization (GNSO) Council to improve the user experience for both registrars and requestors, including improvements to the user interface, ongoing work to develop an authentication protocol for law enforcement users, as well as exploring options for voluntary ccTLD participation. ICANN is committed to ensuring the service remains available while policy work is aligned and finalized.</li> </ul>
<p><b>5.c. Domain Registration Data: Accuracy</b></p>	<p>The GAC continues to emphasize the importance of accuracy in domain name registration data for the security and stability of the DNS. The current state of work at ICANN, as well as relevant practices to ensure accuracy, were described by representatives from the community in a presentation to the GAC at ICANN84. The GAC notes the outcomes of the work of the GNSO Small Team on Accuracy and urges the GNSO to identify an implementation path for their recommendations. In particular, in relation to the Small Team’s first recommendation, the GAC notes that the Registrar Accreditation Agreement (RAA) currently provides a 15-day timeline for registrars to validate and verify the contact information of registrants. Since malicious actors often utilize new domain names within hours of registering them, the GAC recommends that registrars be required to complete these validation and verification steps before a newly registered domain name can become accessible through the DNS, or before a domain name transfer can be completed. For example, this change could be achieved through policy development or through an amendment to the Registrar Accreditation Agreement (RAA) and/or the RDDS Accuracy Program Specification. Verification of contact information could be performed, for example, through automated email or phone-based mechanisms at the point of registration or transfer.</p> <p>In addition, the GAC appreciated the clarification expressed by the GNSO Small Team Chair that the recommendation to terminate the Accuracy Scoping Team, paused since 2022, would not imply the end of community work on this matter. The GAC is of the opinion that the ICANN community should have an ongoing active forum in which to continue discussing possible next steps related to accuracy, whether it is the Scoping Team or another entity. These discussions should be open to community members outside the GNSO, including interested GAC members.</p>	<ul style="list-style-type: none"> <li>• The ICANN Board appreciates the GAC’s continued interest in the topic of accuracy in domain name registration data.</li> <li>• The ICANN Board notes that in accepting the GNSO Accuracy Small Team's recommendations, the GNSO Council referred the first recommendation to the GNSO Council's DNS Abuse Small Team, which considered the issue. Ultimately the community agreed to prioritize other topics, including bulk registrations and associated domain checks, for the first two phases of the DNS Abuse PDP. Other topics, including examining the existing process for validating and verifying registration data garnered significant support across SGs and ACs. The GNSO has noted it will consider validation and verification (among others) for later policy development phases, subject to available resources, community bandwidth, and Council priorities.</li> <li>• The Board understands the GAC would like to see an “ongoing active forum” to discuss next steps related to accuracy. Insofar as such discussions may require policy development, this suggestion could be shared with the GNSO Council.</li> <li>• The Board notes the GAC’s encouragement of ICANN to undertake “holistic assessments of such emerging trends and to promote exchanges of best practices among registries and registrars toward developing globally consistent yet locally adaptable accuracy frameworks.” Could the GAC clarify whether this suggestion is directed at ICANN org or for the community to discuss in the context of a policy development procedure?</li> </ul>

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	<p>The GAC notes the evolution of technologies and registration practices that may affect the accuracy and reliability of domain registration data. The GAC encourages ICANN to undertake holistic assessments of such emerging trends and to promote exchanges of best practices among registries and registrars toward developing globally consistent yet locally adaptable accuracy frameworks.</p>	
<p><b>6. Governance of Regional Internet Registries (RIRs)</b></p>	<p>The GAC welcomed the update from the Address Supporting Organization (ASO) regarding the second draft of the Governance Document for the Recognition, Operation, and Derecognition of Regional Internet Registries. The GAC appreciates the efforts to provide a clear rationale for the changes and notes that many of the public comments on the first draft have been addressed.</p> <p>The GAC underscores the importance of continued consultations with all stakeholders to align the governance framework, in a manner consistent with ICANN’s core values of transparency, accountability, and inclusiveness.</p> <p>In regard to subsequent implementation of the new governance framework, the GAC emphasizes that ICANN’s multistakeholder community, including its Supporting Organizations and Advisory Committees, should have an appropriate and constructive role in matters relating to the recognition and derecognition of Regional Internet Registries.</p> <p>The GAC would welcome continued dialogue with ICANN and the Regional Internet Registries on operationalising the new framework to maintain trust and confidence in the Internet numbers governance system.</p>	<ul style="list-style-type: none"> <li>• The ICANN Board appreciates the GAC’s continued interest in the evolving governance of the Regional Internet Registry (RIR) system. The ICANN Board looks forward to considering the final “Governance Document for the Recognition, Operation, and Derecognition of RIRs” document when it is submitted by the ASO.</li> </ul>