I C A N N | G A C
Governmental Advisory Committee

84 | ANNUAL GENERAL MEETING

MINUTES OF MEETING
ICANN84 Annual General Meeting, 25-30 October 2025

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1. MEETING ATTENDANCE & MEMBERSHIP

72 GAC Members and 9 Observers attended the meeting.

GAC membership currently stands at 184 Member States and Territories, and 41 Observer Organizations. A list of ICANN84 GAC meeting Member and Observer attendees is provided in Attachment 1 - ICANN84 Annual General Meeting - GAC ATTENDEES LIST.

The ICANN84 GAC Communiqué is published on the GAC website at: https://gac.icann.org/contentMigrated/icann84-dublin-communique.

Presentations used by speakers during the meeting and supporting briefings prepared for the GAC can be accessed from the GAC website at: https://gac.icann.org/agendas/icann84-dublin-agenda.

Full transcripts for each meeting session are to be made available from the ICANN84 Public Meeting website, via the relevant agenda items on the GAC's website agenda page listed above.

1.1. Opening Plenary Session

The GAC Chair officially welcomed in-person and remote attendees to the GAC Public Meeting in conjunction with the ICANN84 Annual General Meeting. He highlighted particular aspects of the meeting week agenda and support staff shared logistical information to help all attendees participate effectively during the meeting week. The GAC Chair was joined by the Ireland government's representative to the GAC who offered opening welcome remarks to attendees.

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

The committee engaged in the traditional "tour de table" ceremony during which all GAC delegates attended in-person and virtually introduced themselves.

GAC members also reviewed the Communiqué drafting schedule and process for ICANN84. The process has progressively evolved in the past several years and attendees were familiarized with how some of those recent innovations would be encompassed for ICANN84.

2. PUBLIC POLICY AND SUBSTANTIVE ISSUES

2.1. New gTLDs Next Round

The GAC held two sessions at ICANN84 to review the New gTLD Program Next Round and receive updates from ICANN org. The Chair opened the discussions by underscoring the significance of the upcoming application window and the GAC's longstanding interest in ensuring that the program is inclusive, transparent, and aligned with global public policy considerations. He welcomed ICANN org presenters and highlighted that the two sessions would focus primarily on the Applicant Support Program, application system readiness, program communications, implementation clarifications raised in previous GAC exchanges, and the GAC Early Warnings process.

ICANN org began by providing an update on the **Applicant Support Program (ASP)**, outlining the evaluation criteria, documentation requirements, timelines, and support processes in place ahead of the application window. Staff clarified that the widely cited expectation of "at least 10 applications" was an internal planning assumption rather than a performance target or indicator of program success. They noted that applicants entering the system before 19 November would benefit from an extended period to complete their submissions. ICANN confirmed that ASP evaluators were already contracted, trained and prepared for the review process, and that the ASP had been designed to incorporate lessons learned from the 2012 round.

A number of GAC members intervened with questions reflecting regional needs and concerns. GAC Topic Leads recalled the earlier joint GAC–ALAC correspondence requesting an expedited readiness review of the ASP, and encouraged GAC members to intensify outreach efforts within their regions. Some GAC members sought clarification on how financial need would be assessed in practice and what applicant profiles the program was designed to support, and requested further detail on evaluation timelines, application documentation and expected levels of demand. GAC members asked how ICANN would ensure consistency among evaluators and whether a clear framework for oversight was already in place. Other GAC members expressed interest in additional transparency around ICANN's planning assumptions and resource modelling. ICANN org confirmed that the ASP guidance materials, documentation and criteria would be fully published and that additional clarifications could be provided to the GAC as needed.

ICANN org also briefed the GAC on the **operational readiness of the New gTLD application system**. Staff reported successful internal testing of the platform, including multilingual functionality and accessibility reviews, and explained that translation work was progressing on schedule. They confirmed that offline guidance materials would be available for applicants who may face connectivity limitations. Several GAC members highlighted the importance of ensuring that system design and documentation are accessible to applicants in regions with lower bandwidth or inconsistent internet access. ICANN org reiterated that comprehensive support materials would be published before launch and that additional onboarding guidance would be offered through webinars and documentation.

Discussions also addressed **communication planning, transparency, and expectations for data reporting during the application period**. GAC members underscored the importance of timely

publication of aggregate data to help governments anticipate potential requests for information or support, particularly in relation to geographic distribution and ASP participation. Members requested regular updates during the application window, including snapshots of application volume. ICANN org confirmed that it intended to publish periodic updates for the community and would provide clarity on data reporting intervals once the application window opened.

The GAC devoted significant time in the second session to discussing the **GAC Early Warnings process**. The Chair explained that GAC leadership and GAC Support staff had worked with ICANN to prepare a draft GAC Early Warnings Procedure and had circulated that draft to GAC members in early October for comment. The process covers an overview of early warnings, timing for submission, the submission procedure itself, and a template for GAC members to notify applicants; and the GAC Chair encouraged members to provide further edits directly in the shared document. Some GAC members urged that the early warnings guidance be made as clear and instructional as possible given the large number of new GAC representatives, and suggested including specific dates and examples to reduce confusion. GAC members discussed the possibility of the process being automated to the greatest extent possible, asking for mandatory template fields (such as applicant ID) so submissions are complete and staff workload for manual checking is reduced. Members also urged a textual correction in the template to reflect that applicants "may address" concerns rather than "can address" them, since in some instances it may be impossible for an applicant to resolve national-level objections.

Members asked when the early warning draft could be finalized given the volume of inputs. The GAC Chair encouraged members to provide any final edits promptly and indicated the document should be cleaned up and published as soon as practicable, ideally within days. GAC members agreed on the importance of producing clear instructions, automated templates where feasible, and rapid staff follow-up so GAC members can use the process effectively.

The Chair closed the sessions by thanking ICANN org staff and GAC members for their constructive engagement. He emphasized the GAC's expectation of continued transparency, inclusiveness and responsiveness as the application system prepares to launch and confirmed that further updates would be reviewed in upcoming GAC meetings and intersessional activities.

Action Point(s):
- **GAC Support Staff** will finalize the early warnings draft, incorporate requested template adjustments, explore automation options, and circulate the completed process to the membership.

2.2. WHOIS and Registration Data Issues

In the interest of time, background information on this subject matter was only referenced as provided in the session slides, including an updated overview of the continuing multi-phase efforts undertaken at ICANN to define a new registration data policy framework which would include requirements consistent with applicable data protection law, as well as a final access system to non-public registration data for lawful and legitimate purposes. GAC Members may also refer to the GAC Briefing documentation for this session.

Four topics were discussed during this GAC plenary session: the Registration Data Request Service (RDRS), status of discussions of Privacy/Proxy services, Urgent Requests for Disclosure of Registration Data and Accuracy of Registration Data.

Regarding the **Registration Data Request Services (RDRS)**, it was recalled that this service serves as a pilot program for the original EPDP Phase 2 policy recommendations for a Standardized System for Access and Disclosure of registration data (SSAD), the consideration of which have been paused given the potential cost and complexity of implementation. It was recalled that throughout discussions of this pilot program, before and after its launch, the GAC provides encouragement and feedback, which it was indicated has now largely been echoed by the ICANN Board. GAC input included in particular the need for full registrar participation in RDRS, the share of which was reported to not have exceeded 60% of all gTLD domains under management at any given time. The challenges and limitations of the RDRS were recalled as illustrated by the very limited share of domain lookup (a necessary step to formulate an RDRS request) that led to actual disclosure of the underlying registration data. It was recalled that prior to the ICANN84 meeting, GAC Comments[1] were submitted on the RDRS Standing Committee Report, stressing in particular that RDRS should continue to be improved as the pilot program is extended, and that work should progress toward achievement of the ICANN Board's expressed goals for the RDRS. In the coming months, it is expected that ICANN org will seek community input on a possible path to accomplish the Board's vision for RDRS through existing policy and policy discussion venues. Eventually, the GNSO Council and ICANN Board are expected to engage on the basis of the RDRS Standing Committee Recommendations and the community input on ICANN's to be published Policy Alignment Analysis[2].

A GAC Member noted discussion by the ICANN Board during ICANN84 of the possibility to supplement SSAD recommendations without the need for the Board to reject them, although the details of such a procedural path were not clear to the Topic Leads on this matter. Another GAC Member, recalling the potential of RDRS to provide high benefits to its users, but deploring the shortcomings and poor performance of the service to date, stressed that current usage should not be interpreted as insufficient demand for the service. In response to claims by registrars that their own systems are better than the RDRS, this GAC Member called on stakeholders to bring best practices to the table to improve the RDRS. The presenter, a GAC representative in the RDRS Stranding Committee, noted that requestors need a unified intake portal such as the RDRS, as they

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[1] https://gac.icann.org/statement/public/gac-comments-rdrs-sc-report-29sep25.pdf
[2] ICANN's RDRS Policy Alignment Analysis was eventually published for public comment at the end of the ICANN84 meeting

cannot be expected to maintain awareness of the specific systems of thousands of registrars, and that improvements currently being recommended include API access for registrars to automate processing of RDRS requests via their own systems.

In the later part of the session, the CEO of NIXI, manager of the .IN ccTLD, discussed voluntary participation of ccTLDs in the RDRS. He suggested that such participation must remain optional and consider country-specific challenges, including potential concerns with data sharing across borders, which could be addressed through specific bilateral or regional arrangements.

Regarding the **status of discussions of Privacy/Proxy services**, it was highlighted an Implementation Review Team (IRT) was reconvened by ICANN org in June 2024 to consider how to move forward with the 2016 GNSO policy recommendations (regarding accreditation of such service) in light of notable changes to law, policy, and industry practices since. It is currently expected to start considering GNSO guidance on various issues that have prevented progress to date. It was also recalled that the GAC and ICANN Board are seeking the RDRS to facilitate disclosure of the registration data of the underlying registrants using a proxy or privacy service.

Regarding **Urgent Requests for Disclosure of Registration Data** in circumstances that pose an imminent threat to life, serious bodily injury, critical infrastructure, or child exploitation, it was recalled that the ICANN Board approved policy recommendations as part of EPDP Phase 1, and that interested stakeholders could not agree, subsequently, as part of implementation of these recommendations, on an appropriate timeline for responses to such requests. The GAC has argued that responses in such circumstances should be as soon as possible and no later than 24 hours, while ICANN Contracted Parties have sought to be given up to 3 business days for such responses.
In light of this situation, the ICANN Board determined, following a correspondence from the GAC, that it was necessary to revisit the relevant policy recommendation (EPDP Phase 1 Recommendation 18). In the ICANN79 GAC San Juan Communiqué, 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. The ICANN Board subsequently decided to defer action on this advice and initiated a consultation with the GNSO Council to determine the next step in this unprecedented procedural situation. It was highlighted that the ICANN Board believes responding to such imminent threats should be done in minutes or hours rather than days, but that this requires the ability to authenticate self-identified emergency requestors and that no cross-border system for such authentication exists.
Consistent with the October 2024 GAC proposal to the ICANN Board that two tracks of work be conducted in parallel, before ICANN82, the PSWG Co-Chairs have initiated the formation of Practitioners Group with representatives from several "umbrella" law enforcement organizations (including INTERPOL, Europol and the US FBI) and from several stakeholder groups in the GNSO (RrSG, RySG, NCSG, BC). This group continues to report encouraging progress on both a short and long term authentication mechanism as ICANN, Interpol, Europol and the FBI are actively exploring the feasibility of interfacing existing and future law enforcement resources with ICANN's. In the meantime, since ICANN82, ICANN org has reconvened the EPDP Phase 1 Implementation Review Team (IRT) to determine an appropriate timeline for response to Urgent Requests. It was reported that the IRT has possibly reached a compromise before ICANN84 by which Contracted Parties would

respond to authenticated Urgent Requests within 24 hours and in exceptional circumstances (such as force majeure) in no more than 72 hours. It was also noted that Registrars have continued to express reservation about the 24-hour timeline, and that ICANN org raised the question of whether implementing a Law Enforcement authentication mechanism would require additional GNSO Policy Development. GAC Topics Leads shared their belief that this was not necessary and noted the ICANN Board's signaling during ICANN84 that new policy development may not be necessary either. In the weeks following the ICANN84 meeting, the GAC Small Group on Registration Data was expecting to share for GAC Members' review a GAC Comment in response to ICANN's public comment proceeding on this matter.

A GAC Member closely involved in the work on Urgent Request expressed satisfaction with progress being made, thanks in part to the GAC's involvement and prior advice to the ICANN Board, and invited the GAC to remain vigilant until the actual conclusion of the process. Regarding discussion of needing new policy development to implement an authentication mechanism, another GAC Member stressed that this was only a matter of technology and a choice of technical platform rather than policy. Another GAC Member from the African continent wondered how law enforcement can become an authenticated requestor and what happens if a registrar does not respond to a request coming from outside of their jurisdiction of operation. It was indicated that Interpol is aiming to create a portal for this purpose that would be available to all of its Member States. Additionally, registrar in response to a law enforcement request would be a matter for ICANN Compliance to review.

Regarding the **Accuracy of Registration Data,** it was recalled work had stalled since the pause of the Accuracy Scoping Team in 2022 and that the GAC had raised concerns on this matter consistently and repeatedly throughout this period. Looking forward to achieving progress, GAC Topic Leads requested a pre-ICANN84 briefing from ICANN Compliance on the current state of accuracy-related requirements in ICANN contracts and how they are enforced[3]. Recently, the GNSO Council resolved to close the Accuracy Scoping Team and determined that progress on Accuracy could be made by examining the contractual 15-day timeline for Registrars to validate a registrant's contact information to ensure contactability. It was recalled that the GAC had noted this development with interest during ICANN83.

As part of the ICANN84 GAC plenary discussion of this matter, the GAC Topic Leads invited a panel of community experts to share their perspectives. Several topics were proposed for discussion: the possibility to require validation of registration contact information before a domain can be activated; the possibility for assessment of registration data accuracy with a lack of public access to registration data; and what could be next steps for work on those issues at ICANN.

Jeff Bedser, from the Security and Stability Advisory Committee (SSAC), recalled that accuracy of Registration Data has been on the SSAC agenda for the last decade by virtue of how fundamental it is to DNS security and stability. As part of SSAC's work and recommendations on these issues, SAC058

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[3] See material and recording of this GAC Webinar on 15 October 2025 on the GAC Website at
https://gac.icann.org/sessions/gac-webinar-on-accuracy-of-registration-data-15-october-2025

(27 March 2013) established a systematic approach to data validation which served as foundation for SSAC's most recent contribution on these matters. In SAC129 (7 July 2025), which laid out the core arguments for data accuracy, SSAC argued that inaccurate data hinders communication and identification, impairs law enforcement, anti-abuse efforts and cyber-attack notifications to victims and disrupts key operations around domain names including security analysis, domain transfers, and dispute resolution. Moving forward, and In summary, SSAC recommends that, in order to make progress, accuracy be defined (What constitutes "accuracy" under various regulations?), that accuracy be achieved at levels that fit specific needs, and that these needs and benefits inform the imposition of justified commercial burdens. Technological developments were also mentioned as necessitating considerations in those discussions, including how phone numbers have become less reliable, and not much more than emails have ever been, to assert the identity of a person, and how Artificial Intelligence based forgery is making it harder to validate legitimate government-issues documentation.

Paul McGrady, a NomCom appointee representing the Non-Contracted Parties House on the GNSO Council, and leader of the GNSO Small Team on Accuracy, reviewed the recommendation of this Small Team that were adopted by the GNSO Council and stressed that this team is expected to become the new venues for future GNSO work on Registration Data Accuracy. He did not specifically address the three topics that were proposed for discussion.

Sarah Wyld, Vice-Chair for Policy of the Registrar Stakeholder Group, and a representative from the Canadian Registrar Tucows, discussed Registrar's perspective on what accurate registration data is (the format of the data is correct, and the data "actually works"), what is required by ICANN contracts and policy (all obligations in the Registrar Accreditation Agreement), and taking a concrete example, what this means operationally for registrars relations with its customers.

Devesh Tyagi, CEO of NIXI who operates the .IN ccTLD, shared the results of a comprehensive verification and validation process for registration data of all .IN domain registrations: name, address, email, and phone number. Overall, 4% of all registrations were found to be inaccurate and to cause distrust in .IN domains. The amount of inaccurate domains was eventually reduced 20-fold as a result of this process. This reduction also led to a measurable decline in malicious activity involving .IN domains. In order to maintain accuracy going forward, as well as position .IN as a global example of trust and "cyber hygiene", NIXI has implemented Know Your Customer (KYC) requirements for all new registrations, uses AI-driven anomaly detection and cross verification with national identity databases and conducts risk-based audits of registrars.

2.3. DNS Abuse

This GAC plenary session on DNS Abuse Mitigation took place as part of the implementation of the GAC Strategic Plan and the latest corresponding GAC Annual Plan, which aim to advance ICANN policy work on DNS Abuse before further delegation of new gTLDs while also building the subject matter capacity of GAC Members on these issues.

In preamble to the GAC's discussion during ICANN84, the **Irish ccTLD Manager** was invited to provide a keynote address to the GAC. Declan McDermott, Internet Policy & Regulatory Affairs Manager for IE Domain Registry (which has managed the .IE ccTLD since 2000) delivered a presentation on how this ccTLD Registry tackles "Illegal and Technical Abuse" including: phishing, malware and botnets (Technical abuse), display and distribution of illegal content (Content Abuse) and registration of domains maliciously or in bad faith (Registration Abuse). It was noted that .IE sees very low volume and rates of abuse, in part because there are restrictions to who can register a .IE domain name, requiring a provable "connection to Ireland" by virtue of residency, nationality and location of service. The presentation focused on the layered policies and practical measures in place to prevent the occurrence of abuse of .IE domain names, the protocol for response to abuse in collaboration with relevant regulatory authorities, and the concept of a ladder of possible interventions. The presentation argued that effective mitigation requires technical and organisational measures; that interventions must be appropriate, necessary, and proportionate; and that meaningful collaboration between regulators, registrars, and the registry is key for .IE.

In reaction to the presentation, a GAC Member sought to understand how the appropriateness and proportionality of prevention measures and interventions are determined and whether they are periodically reviewed. It was clarified that a multistakeholder policy advisory committee, which includes government representatives and registrars, is generally involved in policy changes and that public consultations are also sometimes considered for substantial policy changes. As for the reactive stance of .IE's protocol for response to abuse, it was indicated to be justified by the low risk profile of the small .IE ccTLD, as well possible legal obstacles to a more proactive moderation approach. Although it was noted that approaches may vary depending on the local context in these areas.

GAC Topics Leads on DNS Abuse recalled the definition of DNS Abuse as adopted in ICANN's 2024 contract amendments as including: malware, botnets, phishing, pharming, and certain spam cases. It was noted that while ICANN's role in DNS Abuse mitigation is limited to its contractual relationships with registries and registrars, there is a broader ecosystem of stakeholders such as resellers, hosting providers, and ccTLD operators who can and do contribute to the mitigation of DNS Abuse outside of ICANN's remit. Several recent developments were recalled in preamble to the GAC's discussion during ICANN84 including the INFERMAL Analysis Report and a White Paper by NetBeacon Institute which spearheaded the scoping of possible issues ready to be tackled via ICANN policy. Subsequently, in the GAC Prague Communiqué, 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.*"

Regarding **consideration of policy development on DNS Abuse**, GAC Topic leads reminded GAC Members of the release on 8 September of the Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation[4] which offered analysis of potential policy gaps identified by an earlier GNSO Small Team on DNS Abuse and suggested prioritizing three "narrowly scoped" topics, including two for immediate policy development: the use of unrestricted APIs for registering domains, a requirement for registrars to check all domains associated with a registrant who has been found to have abusive domains (associated domain checks) and collaboration on Domain Generation Algorithm (DGA) used in botnets. In the GAC Comment[5] (18 October 2025) that was submitted before ICANN84, the Committee expressed support of the proposal and reiterated its request that policy development proceed as efficiently as possible to deliver concrete outcomes before the next round of gTLDs. The GAC also called for including a resolution path for all gaps identified in the Issue Report.

As far as GAC participation in the GNSO PDPs expected to start in the next few months, GAC Topic Leads suggested that the GAC adopts for DNS Abuse the GAC Small Group model used since 2018 on Registration Data. While any GAC delegate may observe a GNSO PDP, only 1 or 2 participants (and 1 or two alternate) may represent the GAC on GNSO PDP. Thus, a GAC Small Group structure enables coordination among all interested GAC members as well as the formation of consensus positions to be brought to the GNSO PDP Working Group. It is expected this new GAC Small Group on DNS Abuse will be set up once the relevant GNSO PDP Working Group(s) are initiated.

Several GAC Members expressed interest in joining the work of the future GAC Small Group on DNS Abuse in light of the importance of this issue for ICANN and their governments. Several GAC Members recalled the importance of new transparency requirements on Contracted Parties to ensure public reporting on their DNS Abuse mitigation activities, including the number of abuse reports they received and how they are addressed). Regarding the use of unrestricted APIs, also previously referred to as "Bulk registration", another GAC Member suggested that policy discussions should consider all possible ways to effect registrations in bulk, which may not necessarily be through APIs. Finally, a GAC Member highlighted several policy gaps identified in the Issue Report that had previously been noted by the GAC as priorities including preventative measures and the accuracy of registration data, which remain to be addressed.

Following these policy considerations, GAC Topic Leads moved on to the capacity building part of this GAC plenary session session and introduced the **discussion of Trusted Notifier Programs** by representatives from DotAsia and TWNIC who have been implementing such program to facilitate the reporting of DNS Abuse among trusted partners and increase the effectiveness and speed of mitigation.

DotAsia explained working with the .UK and .TW ccTLDs, through a secure channel, to share actionable evidence of abuse (at an agreed level and format of due diligence) that can be acted upon swiftly. This proves particularly effective in situations such as regionally-targeted phishing campaigns which may be only detected by partners in other regions. Interested ccTLDs are invited to join this

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[4] See public comment proceeding on ICANN's website
[5] https://gac.icann.org/statement/public/gac-comments-dns-abuse-prelim-issue-report-18oct25.pdf

program, in which there are also plans to expand the scope of Abuse intelligence exchanges beyond the strict definition and remit of ICANN.

TWNIC, manager of the .TW ccTLD, highlighted the challenge of addressing abuse at the national level: most of the abuse or illegal activity is conducted via domain names in TLDs other than the national ccTLD. This is one aspect of the value of trusted notifiers arrangements with other TLD registries: threat intelligence can be shared and acted upon quickly by the relevant partners who may not need to replicate investigation/due diligence to confirm a threat. Currently, TWNIC collaborates with several gTLD and ccTLD registries (.ASIA, .UK, .KR and .TOP) as well as registrars. While TWNIC expected activity to increase under these growing arrangements, it reports handling 51 domains so far in 2025 for an average response time of 1-2 days. It was suggested that these types of programs demonstrate the relevance of this non-regulatory model for effective industry collaboration.

The presenter agreed with a GAC Observer who suggested that a standardized framework of criteria for intelligence sharing or actionable reporting could help facilitate the scaling of these types of arrangements. It was indicated that ongoing work between .ASIA and .TW with CleanDNS and NetBeacon may produce useful industry standards.

GAC Members were invited to encourage their ccTLD to join this growing network of trusted registries sharing threat intelligence and actionable reports of DNS Abuse. Arrangements are generally bilateral at the moment, between registries, in the form of MoUs.

3. GAC OPERATIONAL MATTERS

3.1. GAC Strategic Planning

Following intersessional input requested from and provided by GAC Members on the Draft GAC Annual Plan 2025/2026, the GAC Leadership had circulated a Final Draft of the Annual Plan for GAC prior to ICANN84 with a view to endorsing the Annual Plan during the meeting. This was eventually accomplished in the GAC Dublin Communiqué which stated[6]:

As part of the continued implementation of its Strategic Plan 2024-2028, the GAC finalized and endorsed its new 2025/2026 Annual Plan which lays out Expected Outcomes over the next year for 5 each of the 9 GAC Strategic Objectives in the following areas:
   1. *Role for Governments in ICANN*
   2. *Effectiveness of the Governmental Advisory Committee*
   3. *Future Rounds of New gTLDs*
   4. *DNS Abuse*
   5. *Domain Registration Data*
   6. *Universal Acceptance*
   7. *Impact of New Technology on Internet Unique Identifier Systems*
   8. *Internet Governance Awareness 9. Internet Number Resource*

As a result of this endorsement, several updates were made to the GAC Strategic Plan 2024-2028[7] which was originally endorsed in the GAC Kigali Communiqué (17 June 2024).

During the plenary session the GAC Chair and GAC Vice Chairs, in their capacity as "caretakers" of each of the 9 Strategic Objectives, walked the GAC membership through the corresponding Expected Outcomes in the new GAC Annual Plan for upcoming period[8]. While no changes were proposed to the formulation of these Expected Outcomes, this walkthrough led to discussion of specific topics as summarized below.

ICANN Review of Reviews (Expected Outcome 1.4.2)

A representative of the GAC in the Cross Community Group (CCG) reported on ongoing work and in particular on the definition of the "purpose of Reviews" which aims to delineate the scope of the evaluation as to whether ICANN is fulfilling its mission and various commitments as laid out in its governance and operational documentation. This was presented to the GAC, including questions regarding the completeness of the statements, in preparation for cross community discussions held during ICANN84 which GAC members were invited to attend. Regarding continuous improvement objectives applicable to Support Organizations and Advisory Committee (SO/AC), and specifically bylaw-mandated review of SO/ACs, it was recalled that by virtue of its specificity, the GAC is entitled to provide its own review mechanisms (ICANN Bylaws Section 4.4.b), while the Accountability and

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[6] See Section III.4 p.5 at https://gac.icann.org/contentMigrated/icann84-dublin-communique
[7] https://gac.icann.org/work-plans/gac-strategic-plan-2024-2028.pdf
[8] https://gac.icann.org/work-plans/gac-annual-plan-2025-2026.pdf

Transparency Review mechanism may include in its scope of review an assessment of *"the role and effectiveness of the GAC's interaction with the Board and with the broader ICANN community"* (ICANN Bylaws Section 4.6.b.ii.B).

A GAC Member recalled that the ICANN system of reviews was put in place to ensure ICANN's accountability to the global internet community, and noted that reviews have been sprawling and inefficient, leading to concerns with the breakdown of the system, and the Member's plan to closely monitoring the work of the Review of Reviews to ensure that it does not stray from the commitments that ICANN and the community made 10 years ago. Another GAC Member, serving as GAC Vice-Chair, suggested that the special status of the GAC, which is expected to provide its own review mechanism, should be raised proactively in future discussions of review.

GAC Contributions to ICANN Nominating Committee (NomCom) (Expected Outcome 1.6)

This expected outcome states that *"committee membership preference for future contributions to annual ICANN Nominating Committee process, either through direct appointment of NomCom participants or continued annual written criteria contributions"* will be confirmed.

A GAC Member recalled national concerns with GAC participation in the NomCom due to the secrecy under which the NomCom operates, and which may be incompatible with transparency obligations of government officials. Another GAC Member, serving as GAC Vice-Chair proposed that the GAC should be represented in the NomCom and that this could be done in a way that is similar to the GAC Chair's participation as a liaison to the ICANN Board, whose deliberations are subject to non-disclosure principles. Going forward, it was suggested that a concrete proposal be developed to support GAC discussion, considering the NomCom's Terms of Reference to ensure that any GAC proposal is compatible with that Committee's operations.

Survey of GAC Members and Observers (Expected Outcome 2.1)

It was recalled that an ongoing GAC survey at the time of the meeting, aiming for broad participation of GAC Members to provide feedback on GAC operations and barriers to participation, in order to inform much of the work under GAC Strategic Objective #2.

A GAC Member stressed the importance of this work and encouraged GAC participants to respond and thus increase the response rate of only 10% of delegations.

Review/Update of the GAC Operating Principles (Expected Outcome 2.2)

A Co-Chair of the GAC Operating Principles Evolution Working Group (GOPE WG) reported on its recent discussions of recent revisions to the Operating Principles 21 and 31 regarding leadership tenures and elections; finalizing changes to the Operating Principles deemed as administrative only; and consideration of what the new Continuous Improvement Framework adopted by ICANN may mean for the GAC Operating Principles.

Regional GAC Coordination (Expected Outcome 2.5.1)

Noting that recent "GAC Africa" meetings have been conflicting with other GAC activities, a GAC Member suggested that time should be made available on the GAC agenda at ICANN meetings for such regional activities.

Future Rounds of New gTLDs (Strategic Objective #3, Expected Outcomes 3.1 to 3.4)

Several GAC Members expressed interest in a post-mortem analysis of the Applicant Support Program in order to provide insight and improve future initiatives of this nature.

A GAC Member suggested that work in this area should focus, as a first priority, on GAC Readiness (Expected Outcome 3.4) and particularly considering case studies of the previous round of New gTLD, to the extent that such case remain relevant for the new round, thus supporting a hands-on examination of the type of applications and issues that arose then.

3.2. GAC Capacity Development

During ICANN84, the GAC held three capacity development sessions. Two sessions were dedicated to the New gTLD Program: Next Round, including interactive discussions with ICANN Org on the Applicant's Journey, Public Interest Commitments (PICs), Registry Voluntary Commitments (RVCs), and GAC Early Warnings. GAC Members also shared experiences and perspectives from the 2012 round of the New gTLD Program, stressing the importance of early engagement in the application and evaluation processes, and consensus building. To this end, future targeted capacity development initiatives may assist the GAC in preparing for its defined role in the next round. Other topics discussed in capacity development sessions were Artificial Intelligence and its possible uses in the DNS, and the GNSO Policy Development Process (PDP).

4. GAC WORKING GROUPS

4.1. GAC Public Safety Working Group (PSWG)

The PSWG continued its work to advocate for improved measures to combat DNS Abuse and promote lawful, effective access to domain name registration data. The PSWG contributed to the meetings between the GNSO and GAC on DNS Abuse and Registration Data Issues, to a meeting with the ccNSO on online scams, and meetings with the Non-Commercial Stakeholder Group (NCSG) regarding human rights matters which highlighted several aspects of the PSWG's ongoing work. Key takeaways involving PSWG workstreams included the scope of Policy Development Processes (PDPs) to address DNS Abuse, law enforcement authentication, the next steps regarding the Registration Data Request Service (RDRS) and continued progress on work related to Urgent Requests for disclosure of registration data.

4.2. GAC Operating Principles Working Group (GOPE WG)

The GOPE Working Group Co-Chairs updated the GAC on recent activities carried out by the Working Group. The GOPE WG continues its discussion on revision of the GAC Operating Principles. Since ICANN83 the Working Group reconvened and decided a three-pronged approach including: finalizing changes to leadership tenures as voted upon by the GAC membership; finalizing changes to the Operating Principles deemed as administrative only; and considering outcomes of the Review of Reviews process in the Working Group's activities. The GOPE Working Group will continue its meetings post ICANN84.

5. CROSS COMMUNITY ENGAGEMENT

5.1. Meeting with the ICANN Board

1.   ICANN Code of Conduct

GAC Members shared appreciation with the Board for adopting the new ICANN Community Participant Code of Conduct Concerning Statements of Interest (Code). GAC Members are interested to see how quickly the new code can be integrated into various community processes. Board members acknowledged the importance of this matter and thanked the GAC for its contributions to the effort.

2.   Strategic Planning by GAC and the Board

Prior to the joint meeting, the Board had asked the GAC, ""What does the GAC believe should be the Board's and the ICANN organization's policy priorities in 2026, taking into consideration the new Five-Year Strategic Plan, the WSIS+20 review, and the recently launched Cross Community Group on the Review of Reviews?"

GAC Members advised the Board that since last year the committee GAC has devoted resources to developing, implementing and updating Strategic and Annual plans to bolster the committee's proactive stance in ICANN deliberations, increase the Committee's readiness to provide timely and effective advice and policy input, and to assist in communicating the GAC's priorities throughout the multistakeholder community.

Among the GAC's expected outcomes for calendar year 2026, the committee is looking to establish a periodic informal exchange format between the GAC Leadership and the relevant Board Committee for a regular assessment of ICANN's performance in terms of openness, inclusiveness, transparency, and accountability - in the spirit of the multistakeholder approach. Meeting attendees agreed that closer collaboration between the GAC Leadership and certain (appropriate) Board committees responsible for these types of topics could prove to be productive and that those future interactions should be explored.

The committee also identified DNS Abuse Mitigation, the continued operation of the RDRS and make participation mandatory for all gTLD registrars, readying its membership for their role in the Next Round of New gTLDs (devoting substantial resources for capacity development of all committee participants with appreciation to ICANN staff for its support in this area), governance of Regional Internet Registries, and follow-up on the Review of Reviews (with related implementation of the new ICANN Continuous Improvements Program Framework) as areas of particular focus in 2026.

Noting the alignment between these various issues as well as their relative importance to both the Board and the GAC, attendees all acknowledged the value of these planning exercises and the need to stay the course regarding implementation and follow through.

3.   Registration Data Request Service (RDRS)

GAC Members acknowledged that the committee and the ICANN Board have aligned on a number of objectives for the future of the RDRS including:

- Continuing RDRS operation past its pilot period;
- Making RDRS participation mandatory for all gTLD registrars;
- Better facilitating requests through RDRS for the data underlying registrations made with a privacy or proxy service;
- Creating APIs for both registrars and requestors; and
- Considering options to enable voluntary participation by ccTLD operators

GAC Members were pleased to hear from the Board that a new "gap analysis" report was in preparation and could potentially be shared soon.

GAC Question to the Board:

The GAC sought the Board's views on the procedural path and timeline to achieve shared objectives vis à vis the RDRS, while not jeopardizing the future of SSAD recommendations that are otherwise supported by the RDRS Standing Committee.

Attendees acknowledged that this is a very difficult area to resolve. GAC Members were given the heads-up that the Board intends to adopt a resolution at ICANN84 directing ICANN to continue operating the RDRS up to two years until December 2027 while the community completed policy work on SSAD.

It was also shared that the Board will soon publish an RDRS policy alignment analysis for public comment to explore paths forward in a couple of areas. The GAC was advised, there are existing policy recommendations as part of the EPDP policy recommendation that all registrars be required to participate in a registration data access request system. It was acknowledged that both the Board and the GAC support that general view and the ultimate goal to reach an RDRS policy that mandates the inclusion of registrars.

GAC attendees were also advised that the Board is interested in understanding how better integration for registrar systems and requestor systems can be achieved at the request portal in order to cut down overhead and avoid duplication of efforts, both for registrars and for requestors. GAC members were encouraged to carefully review the gap analysis when it is released and to share feedback with the Board.

4.   Urgent Requests for Disclosure of Registration Data

GAC Question to the Board:

GAC members asked for the Board's views on how to meet the terms of the prior trilateral agreement between the Board, the GAC and the GNSO - which included two parallel tracks as part of the implementation of Consensus Policy - so that the work could be concluded expeditiously and that urgent requests, when their circumstances occur, can be submitted, authenticated and

responded to in a timely manner, consistent with the vital public safety interests involved.

Board Members noted that good progress is being made in this area and shared some confidence that further work could proceed along the parallel tracks recently identified without the need for a new policy development process. Reference was made to the latest public comment opportunity opened by ICANN on the timeline for Urgent Requests - with comments due in mid-December.

5.   ICANN Review of Reviews

GAC Question to the Board:

GAC Members asked How the Board will monitor and participate in the recently started Review of Reviews (RoR) to ensure that the effort is staying on track?

Board members noted that the charter of the RoR effort allows them to participate directly in the CCG and showed appreciation for that arrangement. It was also noted that the Board gets updates every week from the RoR Cross Community Group and Board members expect to retain the topic as a consistent agenda item for their regular workshops for the next year

6.   Additional AOB Topics

Members of the GAC shared concerns about continuing challenges being experienced by delegates to obtain visas to attend ICANN public meetings. Referencing the previous expectations of the Meetings Strategy Working Group, Board members were asked to consider visa capabilities of future meeting hosts and other considerations to improve the ability of delegates from developing countries to participate in GAC and ICANN meetings. ICANN Leadership confirmed that the organization continues to include visa processing capabilities among its considerations for where public meetings can be held and noted that visa statistics were recently shared with SO-AC community leaders. There was an expectation among GAC attendees that this matter could be a subject of future Board-GAC discussions.

GAC Members also recognized the impending departures of three current Board members Becky Burr, Chris Chapman and Martin Botterman for their service to ICANN.

● GAC Leadership will explore options for future outreach to the Board, Likely through the BGIG channel to suggest opportunities for more regular communications between GAC Leadership and key Board Committees that impact matters of importance to governments in ICANN.

● GAC Members look forward to the release of the new "gap analysis" report that is apparently in preparation and could potentially be shared soon.

5.2. Meeting with the Generic Names Supporting Organization (GNSO)

The GAC met with the GNSO Council for a bilateral exchange to review ongoing policy developments and shared areas of interest. Discussions focused on the Registration Data Request Service (RDRS), Urgent Requests and Law Enforcement Authentication, Accuracy of Registration Data, DNS Abuse, and Human Rights considerations in policy development.

On **RDRS**, the GNSO Council, through Sebastien Ducos, reported that the Public Comment period had recently closed and that the Standing Committee had reviewed all community submissions, including the GAC's. The revised report will undergo a second consensus call before returning to Council. There was broad agreement to maintain the RDRS while discussions with the ICANN Board continue regarding future funding and possible improvements. Gemma Carolillo (European Commission) underlined the need for a stable and clearly communicated tool to ensure stakeholder confidence, while Sushil Pal (India) and Owen Fletcher (United States) called for strengthened participation and interoperability. Sebastien Ducos highlighted ongoing technical and contractual limits preventing mandatory use but noted work on API integration and potential voluntary participation by ccTLDs. GAC members reiterated the importance of stability, technical consistency, and further outreach to ensure continued use.

Turning to **Urgent Requests and Law Enforcement Authentication**, Thomas Rickert (GNSO) outlined the IRT's current proposal to require responses to urgent disclosure requests within 24 hours (extendable to 72 in exceptional cases). The main issue still under discussion concerns whether authentication of law enforcement authorities should be treated as policy or implementation. The matter is open for Public Comment until 15 December 2025. Gemma Carolillo (European Commission) and other GAC members emphasized the need to move swiftly on authentication to operationalize the framework. Several GAC interventions, including from Eswatini and India, stressed the need for equitable treatment of requests across jurisdictions and better support for developing countries. The GNSO explained that ICANN cannot impose obligations inconsistent with local law but welcomed further dialogue on cross-border data access and authentication mechanisms, potentially linked to the RDRS or law enforcement portals.

On **Accuracy of Registration Data**, Paul McGrady (GNSO) briefed that the GNSO Accuracy Small Team had concluded its work, focusing on two areas relevant to the GAC's questions: verification of registrant data before activation and public education on accuracy. The first issue has been referred to the DNS Abuse work stream for further consideration, while staff are preparing new educational materials for registrants. Owen Fletcher (United States) supported requiring registrars to complete verification before domains become active or transferable. Martina Barbero (European Commission) welcomed progress and expressed interest in continued dialogue through the DNS Abuse work stream. Sushil Pal (India) reiterated that verification should be simultaneous with registration activation to avoid misuse of anonymous domains.

Regarding **DNS Abuse**, Jennifer Chung reported on the GNSO Council's progress following its preliminary issue report and community consultations. Two topics—API access for bulk registration checks and coordination on domain generation algorithm (DGA) attacks—emerged as priority areas for focused policy work. The GAC's Public Comment was acknowledged as constructive and

supportive of moving forward quickly. Next steps include finalizing the Public Comment summary report, refining the draft PDP charter, and preparing for Council consideration. Susan Chalmers (United States) thanked the GNSO for advancing DNS Abuse work and for committing to launch a policy development process on an accelerated schedule.

Finally, on **Human Rights considerations**, the GNSO sought to learn how the GAC operationalizes human rights assessments in its advice, noting that future GNSO PDPs will include Human Rights Impact Assessments. Jorge Cancio (Switzerland) recalled the GAC's previous work under its Human Rights and International Law Working Group, which concluded that human rights considerations should be embedded directly within PDPs rather than addressed separately. David Bedard (Canada) reaffirmed that the GAC seeks to balance public safety, privacy, and fundamental rights in its advice and supported continued collaboration with the GNSO. Sebastien Ducos suggested that the GAC share a written summary of its approach to support further coordination.

The GAC Chair thanked the GNSO Council for the constructive dialogue and confirmed the GAC's intention to continue coordination on shared priorities intersessionally.

Action Point(s):
- **GAC members** to consider submitting collective input to the public comment proceedings pertaining to the [RDRS Policy Alignment Analysis](#) and on the [Timeline for Urgent Requests for Lawful Disclosure of Nonpublic Registration Data](#).
- **GAC Human Rights and International Law Working Group** to prepare a written note outlining how human rights considerations are incorporated into GAC advice, to be shared with the GNSO Council.

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

The GAC and ALAC held a bilateral session to discuss issues of mutual interest. The agenda focused on the topics of Domain Name System (DNS) Abuse, ICANN's reviews of reviews and a mid-program assessment on the New gTLDs Applicant Support Program (ASP).

On the **DNS Abuse enforcement trends**, the ALAC noted that ICANN contractual compliance on the data enforcement of the contract amendments seems to take curative measures focusing on a remediation plan, but not preventive, and questions the thresholds used and the lack thereof.

On the enforcement trend, the GAC appreciates ICANN compliance sharing the data on a regular basis as it is useful to understand the impact of the contract amendments, although it has limitations (e.g. double-reporting of the same abuse, limited scope, quality) and the data cannot be considered the ultimate source of wisdom as expected. Therefore it was suggested to compliance to consider sharing the data in a machine-readable format. The data compiled by compliance is not automatic and quite manual, hence why sometimes it is difficult for them to provide data in a

machine-readable format. ICANN contractual compliance reports are not the data from the contracted parties, but their own data about how they enforce the contracts.

Pertaining to transparency, this important topic to the GAC was brought up in the past, in the public comment to the contract amendments, and deemed as relevant and needed for further work. Consistent with ALAC's position, further work could be carried out in this area and could strengthen the contractual obligations and possible new policy development. The more data is available from enforcement, the more visibility there will be on the mitigation action from the contracted parties (registries and registrars), which will help clarify what issues remain to address DNS abuse. There is currently no requirement to report on the abuse reports received by registries and registrars.

Regarding the **Reviews of Reviews** topic, from the At-Large perspective the ALAC indicated the frustration that the structural review did not happen despite the strong need for it. The reviews of reviews is the opportunity to have an effective result for the future. The ALAC reported on the ICANN community session that took place the day before, acknowledging the numerous comments and suggestions, while encouraging committee members to share their perspectives. For instance, one of the ideas that surfaced from the community session was that maybe part of the challenge of some reviews in the past has been the fact that it's a fixed set of reviews on a fixed cadence, that the reality should only be on a review that is on a fixed cadence, and everything else would be on an as-needed basis.

The GAC underscored the importance of ICANN reviews and is very keen to see ICANN review's system back on track, to ensure that ICANN continues to effectively and efficiently fulfill its bylaws mandated mission commitments and core values, in a transparent, accountable and inclusive manner. This effort also feeds into the GAC's strategic objective #1 on the government's role in ICANN, where the committee agreed to add ICANN reviews of reviews, and to contribute to the community consultation group efforts in that respect, to ensure ICANN's compliance with any bylaws mandated reviews. With regard to the community consultation, the raw data notes that on the purpose of reviews, the majority of the audience believed the cross community group (CCG) is headed in the right direction. Some comments related to what is missing from the list of purposes noted (1) how Supporting Organizations (SO) and Advisory Committees (AC) processes are consistent with the ever-evolving governance and transparency, performance and execution speed of the organization, (2) the need to include all advices not only those from governments, (3) clarify the components of ICANN in the context of the much-needed structural review referenced, and (4) review the definition of the community, staff, their processes and effectiveness. On the question of what things should be reviewed, some responses included the multi-stakeholder model, travel support allocations, inclusivity and openness of SO and ACs and their stability, accountability and transparency, trust, fit for purpose, and whether the end result of the reviews caused genuine improvement, conflict of interest statements, interrelations between SOs, ACs, NC (NomCom) and the ICANN Board. Lastly, on the question about what would make the review a success, most responses were output oriented, such as producing outcomes that are actionable and measurable. The ALAC suggested taking into consideration newcomers and increasing the opportunities for capacity building, since this work is an effort for the future. Finally, the GAC noted that this work is

an opportunity to see how community groups work together in ICANN and how it fits in with best practices similar to the Sao Paulo Multi-stakeholder Guidelines.

Lastly, on the **ASP mid-program assessment**, the ALAC opened the discussion noting that very few applications were submitted from Latin America and the Caribbean, one from Africa, despite ICANN spending a lot of effort on promoting the program.
The GAC acknowledged ALAC's remarks, emphasizing the aspect of cost, that despite the 85% cost reduction, the program remains expensive. Additionally, beyond the next round of new gTLDs, bringing newcomers to the ICANN community has been an issue, the GAC emphasized the need for expanding and reaching a new audience which the ALAC, GAC and other community groups should collaborate on.

5.4 Meeting with the Security and Stability Advisory Committee (SSAC)

[Session material: https://gac.icann.org/agendas/icann84-dublin-agenda]
The GAC met with the SSAC on policy issues and shared areas of interest. Discussions focused on the Free and Open-Source Software (FOSS) in the DNS, the impact of string collision and similarities on security and stability of the DNS, the DNS abuse policy issues paper, and future cooperation between both groups.

On the first topic, the SSAC introduced the recent report (SAC 132) on the **role of FOSS in the DNS**. Unlike commercial software, FOSS is a collaborative, global effort that can be used for any purpose, it can be studied to understand how it works, it can be shared and distributed and changed to fit the user's needs. The inherent risks of FOSS in general may pertain to the maintainer's burnout since most FOSS released on single, unpaid volunteers, there is no entity required to fix problems. This creates a model based on community collaboration rather than the commercial contracts that define a traditional software supply chain, which introduces unique risks related to financial sustainability for the maintenance organizations and maintainer burnout for volunteers.
On the other hand, the strengths of FOSS in the DNS show transparency and collaborative security, stability of the core DNS project supported by stable organizations, and operational resilience through diversity where multiple implementations enable diverse software stacks, avoiding single points of failure and preventing vendor lock-on.
The security of any software project is determined by the quality of its development and maintenance processes, not its licensing model. FOSS is the norm for the most fundamental components of DNS infrastructure. Although the FOSS development model is fundamentally different from that of proprietary software, FOSS is not inherently more or less secure.

Regarding the impact of string collision and similarities on security and stability of the DNS, the GAC noted the importance of the issue, particularly with the next round of new gTLDs.
The SSAC began with introducing the topic noting that this is not a new set of issues, and challenges began with the previous round of new gTLDs. Name collisions occur when a domain used in the global DNS namespace is also used in a different namespace, where users, software, or other functions may misinterpret it, they cause a technical problem causing security and stability issues,

caused by delegation the exact same TLD already used in private networks, whereas a string similarity is a user problem causing confusability issues caused by different public TLDs that look or sound alike. Name collisions fall directly into ICANN's responsibility for the security and stability of the DNS root. In 2017, the ICANN Board tasked the SSAC to conduct a comprehensive study to enable all future gTLD delegations to be done in a secure, stable and predictable manner. The Name Collision Analysis Project Study 2 was published in 2024 (first project published in 2020), to ensure that the findings and recommendations could inform the next round of new gTLDs, presented as a new risk assessment framework to ensure that name collisions can be assessed and to provide a process for ICANN to evaluate mitigation and remediation plans for identified name collisions. The benefits of the framework create proactive risk management, consistent and effective risk assessment, data-driven decision, and privacy concerns addressed.

On the **DNS abuse policy issues paper**, the GAC opened the discussion with the SSAC asking whether any technical recommendations could be shared with the committee. The SSAC is already involved with the GNSO in policy development to speak about specific issues that deal with DNS abuse. The SSAC hopes that there will be a policy development process created that provides the broad framework for behaviors that should be prevented rather than the specific methods by which the behavior is being perpetrated.

The GAC looks forward to future opportunities for collaboration with the SSAC.

5.5 Meeting with the Non-Commercial Stakeholder Group (NCSG)

[Session material: https://gac.icann.org/agendas/icann84-dublin-agenda]
The GAC met with the NCSG on policy issues and areas of common interest. Discussions focused on the Human Rights Impact Assessment (HRIA) on the GAC communiqué, the registration data request service (RDRS), DNS abuse mitigation and ICANN Reviews.

On the topic of the **HRIA**, the NCSG introduced the topic indicating that the NCSG's impact assessment on the GAC communiqué began with the ICANN83 Seattle Communiqué. The methodology used for the HRIA was based on civil society and human rights organizations use to develop human rights impact assessment and due diligence on different organizations. The topics assessed pertain to private data disclosure to law enforcement, urgent requests, accuracy, and DNS abuse. The NCSG finds that GAC advice prioritizes enforcement over privacy, due process and remedy and that overall, the communiqué lacks rights-based framing.

The GAC Human Rights International Law Working Group (HRILWG) co-chair, Suada Hadzovic, provided an update on the work of the working group regarding human rights, based on the options paper for human rights core value (2019), as the working group explored four potential options for implementation of the Human Rights Core Values established in the ICANN Bylaws, while considering the Framework of Interpretation and Considerations document which was part of the CCWG Accountability Work Stream 2 Recommendation, via an online questionnaire to either (1) establish a standing item/question to be considered during the Communique drafting, (2) establish a standing

item/question to be considered for other GAC communications where a position is conveyed, (3) create the position of a GAC HR rapporteur – responsible for flagging issues and to lead in options 1 and 2, or (4) provide for the participation of the GAC in human rights implementation assessments or similar procedural steps established for Policy Development Processes, as outlined in the work of the Cross Community Working Party on ICANN's Corporate and Social Responsibilities to respect human rights (CCWP-HR). Building on these findings, the most supported option - option 4 - related to participating the policy developments processes, as it offers the most practical and sustainable way to ensure human rights are meaningfully considered where they matter the most within the PDP itself. This option allows human rights to be addressed early and systematically, rather than as a separate or parallel process. Through this approach the GAC aims to ensure that human rights are not treated as an afterthought, but as a core element of evidence-based and inclusive policy development across ICANN. The inputs of the GAC, whether through advice, inputs to consultations or public comments are fed into the PDP working group discussions. For the GAC, those proposals are the ones most suitable to be analyzed from a human rights impact assessment perspective, rather than analyzing each constituent's input (ALAC, RSSAC, SSAC advice) or input prepared through the corresponding PDPs.

As a follow-up question to the NCSG, the GAC wanted to better understand how the GNSO intends to implement the HRIA in their PDPs, for instance with the PDP on DNS abuse pilot.

The NCSG, and particularly the Chair of the GNSO Standing Committee of Continuous Improvement, notified the committee that starting with the PDP on Latin Diacritics, from that point, every PDP working group will have the requirement to implement a human rights impact assessment in their work.

The GAC suggested that the GAC HRILWG works with the NCSG on exploring the methodology used to develop the impact assessment.

On **RDRS**, the NCSG believes that authentication does not equate accountability. While authentication ensures the requester is who they claim to be, it does not ensure that the request itself is lawful, proportionate or rights-compatible. It also believes that technical validation must not replace legal thresholds, as verifying law-enforcement credential does not meet requirements for necessity, proportionality, or due process under international human rights standards. On the aspect of global diversity of legal regimes, many jurisdictions lack independent oversight or judicial authorization for data access, and global rollout of RDRS without safeguards risks normalizing unaccountable disclosure practices. Lastly, authentication of law enforcement should be conducted through transparent processes that can be vetted with special protocols in place.

From a human rights aspect, fundamental rights assessment should precede disclosure, as registrars should conduct case-by-case human rights impact assessments (HRIAs) when the requests pose risks to privacy or security of individuals. Before disclosure, registrars should evaluate whether the request meets international norms under the Universal Declaration of Human Rights (UDHR) and the International Covenant on Civil and Political Rights (ICCPR) (articles 12, 17, 19, 23).

Lastly, special scrutiny is needed when requests raise flags for end user or domain name registrant security, freedom of expression, and internal procedures for escalation, independent review, and documentation of high-risk disclosure decisions should be developed.

Regarding **DNS abuse mitigation**, the NCSG talked through some of the guiding principles used to lay the groundwork for response to the interim report on the potential PDPs that can come out into the

ICANN constituency space. The NCSG emphasized on the need for transparency and accountability in developing any kind of DNS abuse mitigation policy, as well as granularity in mitigation, as to who are the actors that can have the least risk of leading to consequences that may expand beyond the target of the DNS abuse. The NCSG added that the CCWP-HR and NCSG members have developed tools for conducting HRIAs for PDPs and have undertaken a collective HRIA on DNS Abuse mitigation during ICANN. These resources could have provided additional and much-needed information to ground this report, but were not cited.

In light of the upcoming PDPs on the issue, the NCSG supports narrowly targeted PDP(s), gathering further opinions from stakeholders during upcoming ICANN Meetings and clear timelines and milestones for any potential PDP(s).

Finally, on the topic of **ICANN reviews/Reviews of Reviews**, the NCSG is looking forward to reviewing and commenting on the "Purpose of the Review" that the Cross Community Group (CCG) has been working on. However, it remains concerned about the novelty of the process, questioning whether this work should be the community's collected effort to closely monitor and ensure the RoR remains a once-and-never incident, and expects substantial and actionable recommendations from the CCG. The GAC underscored the importance of ICANN reviews and is very keen to see ICANN review's system back on track, to ensure that ICANN continues to effectively and efficiently fulfill its bylaws mandated mission commitments and core values, in a transparent, accountable and inclusive manner. This effort also feeds into the GAC's strategic objective #1 on the government's role in ICANN, where the committee agreed to add ICANN reviews of reviews, and to contribute to the community consultation group efforts in that respect, to ensure ICANN's compliance with any bylaws mandated reviews. The CCG is working on developing an efficient and effective system for all ICANN reviews, whether for reviews that should be conducted on a regular basis or occasionally, or upon certain conditions, for a collective system of reviews that is working efficiently and effectively. Lastly, the GAC believes this effort is an opportunity for community groups to work together to improve the multistakeholder process.

5.4 Meeting with the Address Supporting Organization (ASO)

[Session material: https://gac.icann.org/agendas/icann84-dublin-agenda]
The GAC and ASO held a bilateral session to discuss issues of mutual interest, and particularly on the Internet Coordination Policy 2 (ICP-2) adopted in 2021 and revisited as the relationships between regional Internet registries (RIRs) and ICANN have changed, with the need to explicitly provide for RIRs ongoing responsibilities and potential derecognition of an RIR that can no longer adequately provide for the needs of its numbering community. The second version of the ICP-2 review was published in August 2025, with key changes pertaining to the title, preamble, implementation procedures, recognition and derecognition, audits and proposals with new criteria for RIR members or ICANN to request ad hoc audits or propose derecognition, as well as a new emergency continuity procedure to temporarily transfer an RIR's responsibility to an 'Emergency Operator'.
This document does not address the implementation of the RIR governance framework; comments on implementation will be considered out of scope.

To address the GAC's questions related to derecognizing an RIR, the ASO emphasized the point that ICANN does not have the unilateral power to derecognize an RIR under this document. ICANN would make the final decision, but first, the existing RIRs have to approve any decision to recognize or derecognize an existing RIR. There would be processes to transition RIR services to another entity to ensure the continuity of services.

Lastly, regarding the committee's questions pertaining to AFRINIC's representation, the ASO emphasized the importance of having a representative from AFRINIC in the ASO AC, and that the relationship with Africa is a priority to the ASO.

5.5 Meeting with the Country-Code Names Supporting Organization (ccNSO)

[Session material: https://gac.icann.org/agendas/icann84-dublin-agenda]
The GAC and the ccNSO held a bilateral session to discuss issues of mutual interest. The agenda focused on an update on cryptocurrency fraud scam, and a second part, was dedicated to an engagement session format on (Domain) Abuse to explore roles of governments and ccTLDs.

On the cryptocurrency fraud scam, Gabriel Andrews (FBI, GAC PSWG) provided a presentation on the top category of Internet crime that was reported to the FBI over the last several years, called Cryptocurrency Investment Fraud, also known as pig butchering,and started during the COVID pandemic.
The phishing that is conducted at the start of the scheme, is not done through email but via texting applications on mobile devices, through social media, or sometimes through dating sites. One of those accidental messages comes from someone that entices another person to start a conversation. The phishers often will pose as someone who is interested in a friendship, a romantic relationship or business investment, and take their time to build rapport. When the phish-hook is eventually set, the scammers will provide via those chat messages a link to their cryptocurrency exchange. It's a homoglyph domain usually that impersonates other legitimate exchanges that will be registered in bulk, registering hundreds or thousands at a time of domains that impersonate these cryptocurrency exchanges. Phishers will start with a collection of lookalike domains that they can roll through. If one of them gets burned, they quickly move to the next because they have so many of them to choose from. By using a technique called CNAME, forwarding or changing the 'canonical name' settings in these domains, phishers will set the domain to route to the next domain and so forth, before finally reaching the cryptocurrency site at the end. This process will challenge investigators and enable them to rapidly cycle through the bulk registered domains, while keeping a smaller number of protected infrastructure domains behind it. This presentation was intended to set the table for ongoing discussions during the session.

Subsequently, during the second part of the session, the Chair of the ccNSO provided an overview of the different discussion station points (5) related to DNS Abuse (artificial intelligence in abuse detection and prevention, bulk domain registrations, investigating abuse with domain portfolios, national frameworks for scam and fraud prevention, and trusted notifier arrangements). In-person participants had the opportunity to exchange on the topic of their choice for 15 minutes across 3

cycles. At the end of the session, GAC and ccNSO hosts reported on the breakout discussions, all details can be found on the GAC website session page (see above for link).

5.6 Meeting with the WSIS+20 Co-Facilitators

GAC Members welcomed His Excellency, Mr. Ekitela Lokaale, current representative and ambassador of Kenya to the United Nations in New York, who was appointed by the Secretary General of the United Nations to co-facilitate the process of preparation of the outcome document for the WSIS+20 Review process and the upcoming review conference, which is scheduled to take place in New York in mid-December 2025.

The Ambassador expressed his gratitude for the feedback that has been shared on the Zero Draft that was published in August. He noted that the responses were quite overwhelming in a positive sense and that most everything contributed was useful to him and his co-facilitator, Ambassador Jannina, in preparing the next draft (REV1) of the document. He noted that the original draft attempted, as much as possible, to keep the Tunis and Geneva spirits alive. He said he hoped the revised draft would be published by the 7th of November and may prove to be a bit shorter than the original draft document. He encouraged GAC Members to interact with that revised draft as well.

The Ambassador shared that the multi-stakeholder sounding board modality employed for collecting WSIS+20 community input has been very useful, because between the time the co-facilitators had produced the elements paper and the Zero Draft, the drafts benefited not just from inputs from member states but also inputs from other stakeholders that were put forth through the framework of the sounding board. He said that members of the multi-stakeholder sounding board have been encouraged to be in touch with representatives of governments and member states, so that if there are any country-specific or region-specific issues that they would like to channel through the people negotiating on behalf of member states, then they channel them through those colleagues.

When asked, the Ambassador endorsed the idea that GAC representatives should stay in touch with UN colleagues in New York in order to channel views and positions from a technical community point of view, noting that such input could greatly enhance the negotiations.

The Ambassador noted that in the course of all the consultations the co-facilitators have had, there has been a reaffirmation that the WSIS vision is still relevant. There is also a sense, he said, that the WSIS framework is broad enough to accommodate technological advancements that have been witnessed over the years.

# # #

Attachment 1 - ICANN84 Annual General Meeting - GAC ATTENDEES LIST

	Registrations	Attended (in-person & virtual)
Member Delegations	84	72
Observer Delegations	11	9
Member Delegates	132	106
Observer Delegates	14	10

GAC Members (72)		
European Commission	Government of India	Government of Singapore
Government of Argentina	Government of Indonesia	Government of Spain
Government of Armenia	Government of Ireland	Government of Suriname
Government of Australia	Government of Islamic Republic of Iran	Government of Sweden
Government of Austria	Government of Israel	Government of Switzerland
Government of Bahrain	Government of Italy	Government of Chinese Taipei
Government of Bangladesh	Government of Japan	Government of Timor-Leste
Government of Belgium	Government of Kenya	Government of Tonga
Government of Bermuda	Government of Korea, Republic of	Government of Trinidad and Tobago
Government of Bosnia and Herzegovina	Government of Kuwait	Government of Uganda
Government of Brazil	Government of Lebanon	Government of Ukraine
Government of Cameroon	Government of Libya	Government of United Arab Emirates
Government of Cabo Verde	Government of Luxembourg	Government of United Kingdom of Great Britain and Northern Ireland

Government of Canada	Government of Malaysia	Government of United States
Government of Cayman Islands	Government of Myanmar, Republic of the Union of	
Government of Chad, Republic of	Government of Netherlands	
Government of China	Government of Niger	
Government of Colombia	Government of Nigeria	
Government of Costa Rica	Government of Niue	
Government of Croatia	Government of North Macedonia	
Government of Czech Republic	Government of Norway	
Government of Denmark	Government of Paraguay	
Government of Egypt	Government of Portugal	
Government of Eswatini	Government of Russian Federation	
Government of Georgia	Government of Rwanda	
Government of Germany	Government of Sao Tome and Principe	
Government of Grenada	Government of Saudi Arabia	
Government of Holy See (Vatican City State)	Government of Senegal	
Government of Hong Kong (China)	Government of Serbia	

GAC Observers (9)	
Caribbean Telecommunications Union (CTU)	Smart Africa
Commonwealth Telecommunications Organisation (CTO)	Universal Postal Union (UPU)
League of Arab States	World Broadcasting Unions (WBU)
Organization of American States (OAS)	World Intellectual Property Organization (WIPO)
Organisation Internationale de la Francophonie (OIF)	

Attachment 2 - ICANN84 Action Points Compilation

#	Subject Matter	Action Point
1	New gTLDs Next Round	**GAC Support Staff** will finalize the early warnings draft, incorporate requested template adjustments, explore automation options, and circulate the completed process to the membership.
2	Meeting with the GNSO	**GAC members** to consider submitting collective input to the public comment proceedings pertaining to the RDRS Policy Alignment Analysis and on the Timeline for Urgent Requests for Lawful Disclosure of Nonpublic Registration Data.
3	Meeting with the GNSO	**GAC Human Rights and International Law Working Group** to prepare a written note outlining how human rights considerations are incorporated into GAC advice, to be shared with the GNSO Council.