

Privacy & Proxy Service Accreditation Issues (PPSAI)

Definitions

- A **privacy service** allows a customer to register the domain name in their own name as the Registered Name Holder, but the contact information of the privacy service is displayed in the publicly-accessible Registration Data Directory Service (RDDS).
- A **proxy service** allows the proxy service to registered the domain name as the Registered Name Holder, which licenses the use of the domain to the proxy customer. The full registration data of the proxy service/Registered Name Holder must be published in the RDDS.

Privacy & Proxy Service Accreditation Issues (PPSAI)

Background

- In October 2013, the GNSO Council initiated a Policy Development Process (PDP) to make recommendations for consistency across proxy and privacy services. The PDP Working Group (WG) completed [a set of recommendations](#) which were adopted by the ICANN Board in 2016. ICANN org began implementation of these recommendations in 2016, supported by a volunteer IRT.
- Implementation was [put on hold in 2019](#) due to overlapping issues with ongoing work in the GNSO's Expedited Policy Development Process (EPDP) on the Temporary Specification, in light of the work to address the European Union General Data Protection Regulation.

Privacy & Proxy Service Accreditation Issues (PPSAI)

Policy Implementation

- Upon publication of the [Registration Data Policy](#), which implements the EPDP Phase 1 recommendations, ICANN org called for volunteers to convene a new IRT to support the continued implementation of the PPSAI recommendations.
- The new [PPSAI Implementation Review Team \(IRT\)](#) was convened in June 2024. In light of the changes to law, policy, and industry practices since the PDP WG first developed PPSAI recommendations, the IRT was initially tasked with responding to a set of threshold questions to inform continued implementation.
- The PPSAI IRT submitted its [threshold question responses](#) to the GNSO Council on 4 August 2025, with a request for additional guidance from the Council. The GNSO Council responded with its [guidance](#) on 13 November 2025, following discussion at ICANN84.

Privacy & Proxy Service Accreditation Issues (PPSAI)

Objective of Policy Implementation: Develop proxy and privacy service requirements in-line with the PPSAI Policy Development Process (PDP) Working Group's (WG) [Final Report](#) and GNSO Council [implementation guidance](#).

Impact of Policy Recommendations: Once implemented, the new Consensus Policy will supersede the placeholder language (Sections 3.12.4 and 3.14) and the temporary requirements in the Specification on Privacy and Proxy Registrations in the [2013 Registrar Accreditation Agreement](#).

Privacy & Proxy Service Accreditation Issues (PPSAI)

Implementation Plan

- The staff implementation team and community Implementation Review Team (IRT) aligned on an [Implementation Plan](#) and [Work Breakdown](#) for PPSAI on 22 January 2026.
- Implementation progress can be followed on the [PPSAI Wiki page](#).

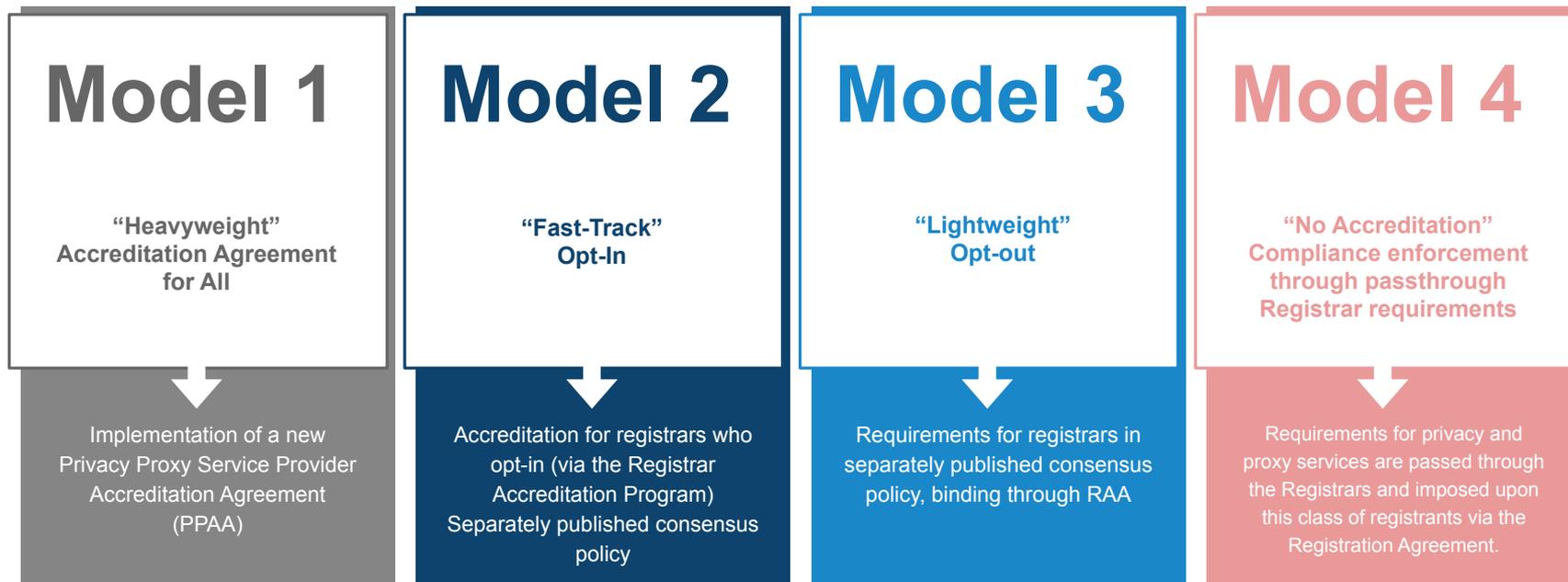
Privacy & Proxy Service Accreditation Issues (PPSAI)

Current Work

- ICANN org and the IRT are working through foundational assumptions for how Consensus Policy requirements would flow through the various parties associated with privacy and proxy services, and how the requirements would be enforced through compliance.
- IRT alignment on the flow of requirements will determine how the Consensus Policy is structured and drafted.

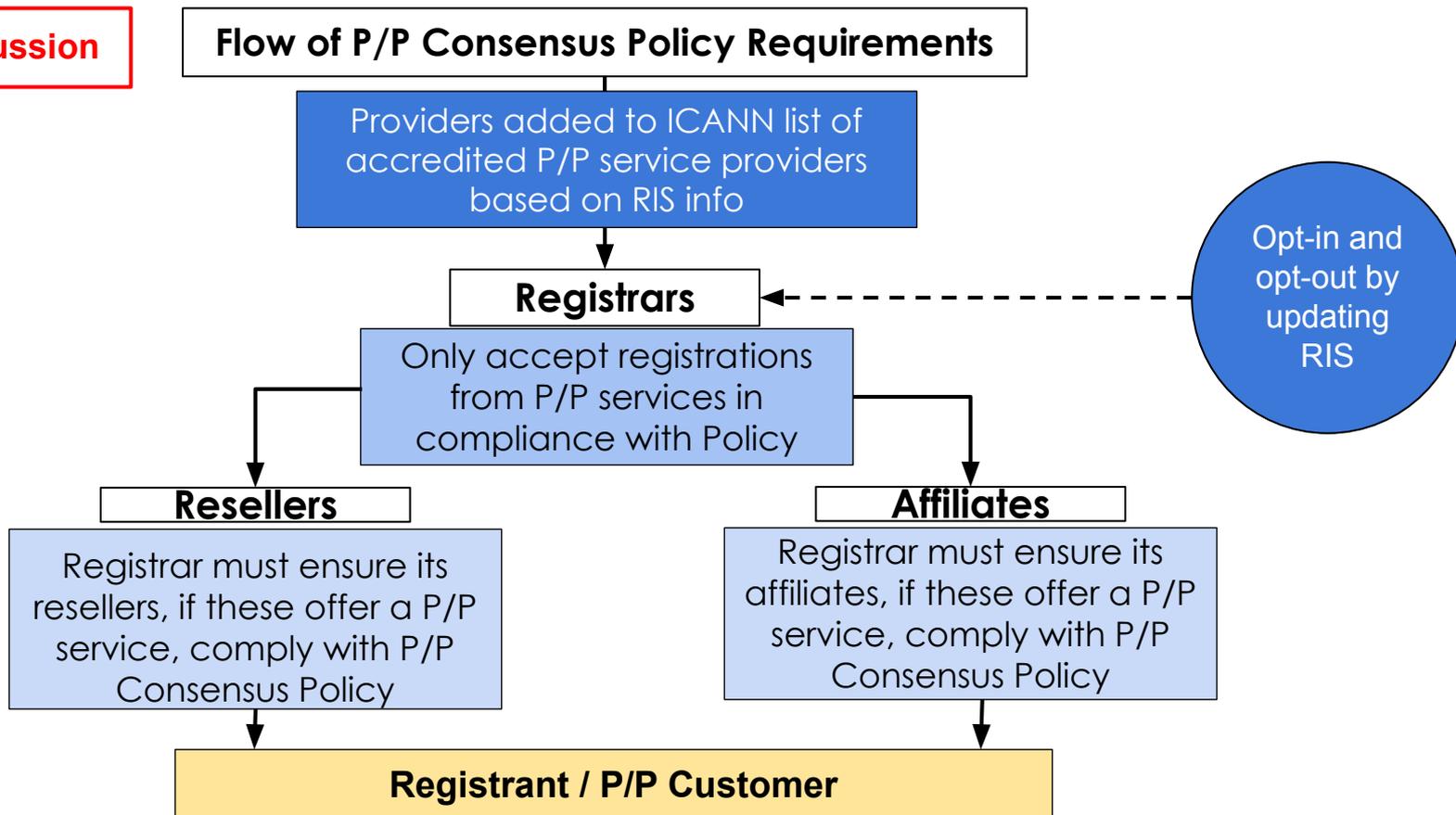
Privacy & Proxy Service Accreditation Issues (PPSAI)

Previously Discussed Models



Privacy & Proxy Service Accreditation Issues (PPSAI)

Draft for Discussion



Privacy & Proxy Service Accreditation Issues (PPSAI)

Upcoming Work

- Following the development of the draft Consensus Policy, the IRT will work through the draft in four modules:
 - **1:** Definitions
 - **2:** Consensus Policy
 - **3:** Disclosure Frameworks
 - **4:** Human Rights Impact Assessment

- The Draft Consensus Policy is targeted for Public Comment in **December 2026**.

Privacy & Proxy Service Accreditation Issues (PPSAI)

Implementation Plan

Deliverables	Status	Target Date
#1: Implementation Plan	✔ Complete	JAN 26
#2: Requirements Flow Alignment / Foundational Assumptions	● Active	MAR 26
#3: Draft Consensus Policy		NOV 26
Module 1: Definitions		MAY 26
Module 2: Consensus Policy		JUL 26
Module 3: Disclosure Frameworks		AUG 26
Module 4: Human Rights Impact Assessment		OCT 26
#4: Public Comment Proceeding		DEC 26
#5: Public Comment Summary Report		FEB 26
#6: Final Consensus Policy		APR 27
#7: Outreach Plan and Deployment Plan		APR 27
#8: Policy Effective Date		OCT 27
#9: Consensus Policy Deployment		OCT 27



Privacy & Proxy Service Accreditation Issues (PPSAI)

Resources

- [PPSAI Wiki page](#)

Current Working Documents

- [GNSO Council PPSAI Responses to Threshold Questions](#)
- [PPSAI Implementation Plan & Work Breakdown](#)

PPSAI Background Documents

- [Prior IRT Working Documents](#)
- [Final Report on the Privacy & Proxy Services Accreditation Issues Policy Development Process 07 December 2015](#)
- ICANN org Implementation Analysis of PDP Recommendations - [Recommendations by Category, Difficulty of Implementing 02 March 2024](#)
- [Definitions Comparison Paper \(FR vs PPAA\)](#)
- [Disclosure Frameworks Assessment Paper](#)
- [Alignment Paper](#)
- [Accreditation Models Paper](#)
- [Candidate Threshold Questions Not Adopted by the IRT](#)
- [IRT Threshold Questions Responses for the GNSO Council](#)