gTLD Registration Data Issues

GAC Speakers:

David Bedard (Canada)
Gemma Carolillo (European Commission)
Matthew Errington (Interpol)
Gabriel Andrews (United States, PSWG)
Owen Fletcher (United States)

Guest Speakers:

Eleeza Agopian (ICANN org)
Jason Kean (ICANN org)

ICANN85
10 March 2026

ICANN | G A C
Governmental Advisory Committee

Agenda

1. **Privacy/Proxy Accreditation Discussions Update**

2. **Urgent Requests for Disclosure of Registration Data**

3. **Update on Law Enforcement Authentication**

4. **Next Steps for the Registration Data Request Service (RDRS) and the Standardized System for Access/Disclosure of Registration Data (SSAD) recommendations**

5. **GAC Mumbai Communiqué Consideration**

Accreditation of Privacy/Proxy Services

Accreditation of Privacy/Proxy Services

- Recent GAC comments on privacy/proxy services have focused on supporting disclosure requests through the RDRS

- Domain registrations through privacy services are now very common

- The GAC is participating in the PPSAI IRT

- Updates from the IRT are likely in coming months

Accreditation of Privacy/Proxy Services

Presentation by: **Jason Kean**, ICANN org

PPSAI Implementation Project Team

Urgent Requests for Disclosure of Registration Data
Timeline for Response

Urgent Requests For Disclosure of Registration Data - Background

- **Stems from ICANN Board-approved EPDP Phase 1 Policy Recommendation 18** (15 May 2019)

- In the policy implementation process (2019-2023) **agreeing on a timeline for response to Urgent Requests for disclosure of registration data** in *"circumstances that pose an imminent threat to life, serious bodily injury, critical infrastructure, or child exploitation"* **proved unattainable**

- **Following Public Policy Issues raised by the GAC** in a letter to the ICANN Board (23 Aug. 2023), **the ICANN Board** "*concluded that it is necessary to revisit Policy Recommendation 18 concerning urgent requests.*"

- In the ICANN79 GAC San Juan Communiqué (11 March 2024), the GAC Advised the ICANN Board "*To act expeditiously to establish a clear process and a timeline for the delivery of a policy on Urgent Requests* [...] to respond to the vital public safety interests related to such requests. [...].

- Following discussions between the GAC, the ICANN Board and the GNSO Council, all parties agreed to proceed in two parallel tracks proposed by the GAC (15 October 2024):
  - **An Authentication Track** to explore possible mechanisms to authenticate law enforcement requestors
  - **A Policy Track** to determine an appropriate response time for authenticated Urgent Requests, assuming an authentication mechanism is in place

Urgent Requests For Disclosure of Registration Data - Current Status

- Following discussions in the Registration Data Implementation Review Team (IRT) which resumed after ICANN83 in April 2025 ("Policy Track"), **the GAC provided [Comments](15 December 2025)** in an [Public Comment proceeding](#) **regarding ICANN's proposed Consensus Policy Language**, seeking finalization of the process, and confirming:
  - **24 hours response timeline** in the absence of exceptional circumstances (force majeure)
  - **To become enforceable upon availability of LEA Authentication mechanisms**, **without requiring additional policy development**

- Discussion with and between the GNSO Council and the ICANN Board during ICANN85 have clarified next steps towards enforceability of this timeline for response to Urgent Requests
  - On the timeline: the ICANN Board indicated to the GNSO Council its **support for finalizing and proceeding with the 24 hours timeline for response to Urgent Requests** (publication as ICANN Consensus Policy). The GNSO Council signaled to the GAC that there was **general agreement in the GNSO to do so.**
  - On Authentication: **the Board expressed preference** for the GNSO Council to provide guidance that this is an implementation detail. **The GNSO Council indicated that it was leaning towards the alternative option** of providing supplemental policy recommendations on this matter as part of the expected SSAD supplemental policy recommendations.

Urgent Requests for Disclosure of Registration Data
Law Enforcement Authentication
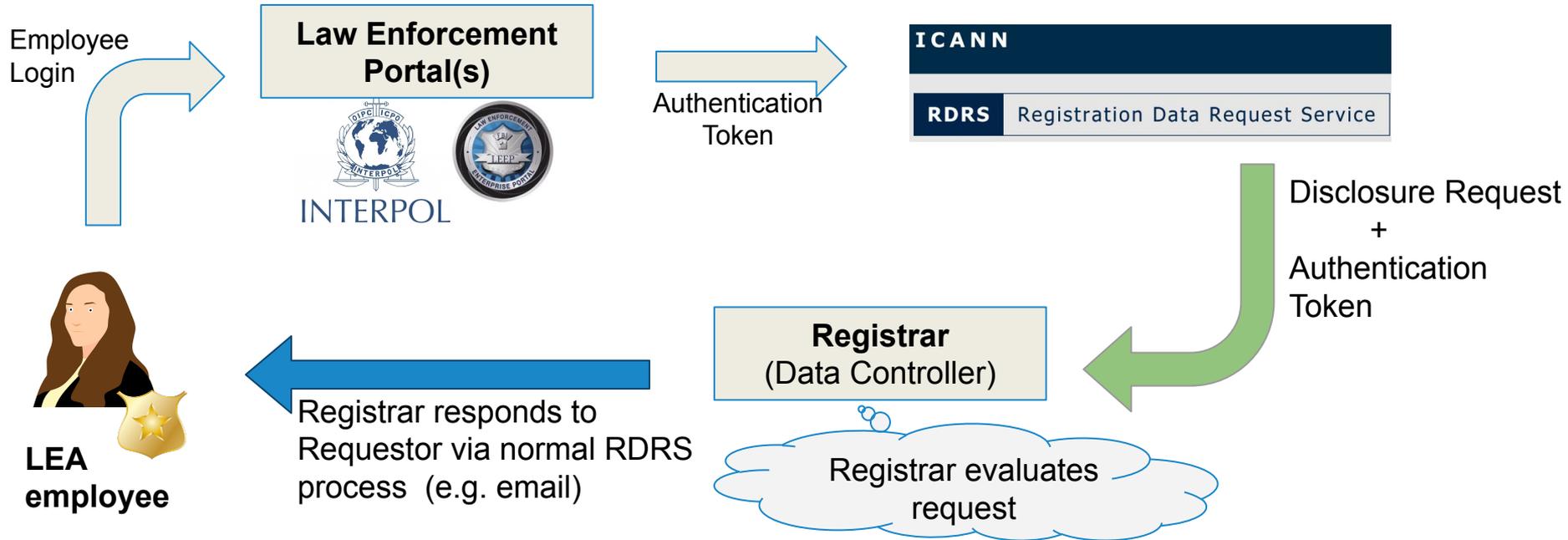
Urgent Requests / LEA Authentication

Background

- In February 2025, following agreement among GAC, ICANN Board and GNSO Council, **the PSWG convened a Practitioners Group** with representatives from the GAC, the GNSO and several law enforcement agencies (including Interpol, Europol and the FBI) **to discuss the feasibility of Law Enforcement Authentication Mechanisms** to enable Contracted Parties to respond swiftly to Urgent Requests.

- During ICANN84 in Dublin, the ICANN Board resolved (30 October 2025) to encourage *"the ICANN President and CEO, or his designee(s), to continue to collaborate with the GAC PSWG on possible law enforcement authentication mechanisms."*

- **Feasibility discussions** among the Practitioners Group and with ICANN org **have focused on a Short Term and a Long Term Authentication Mechanism**
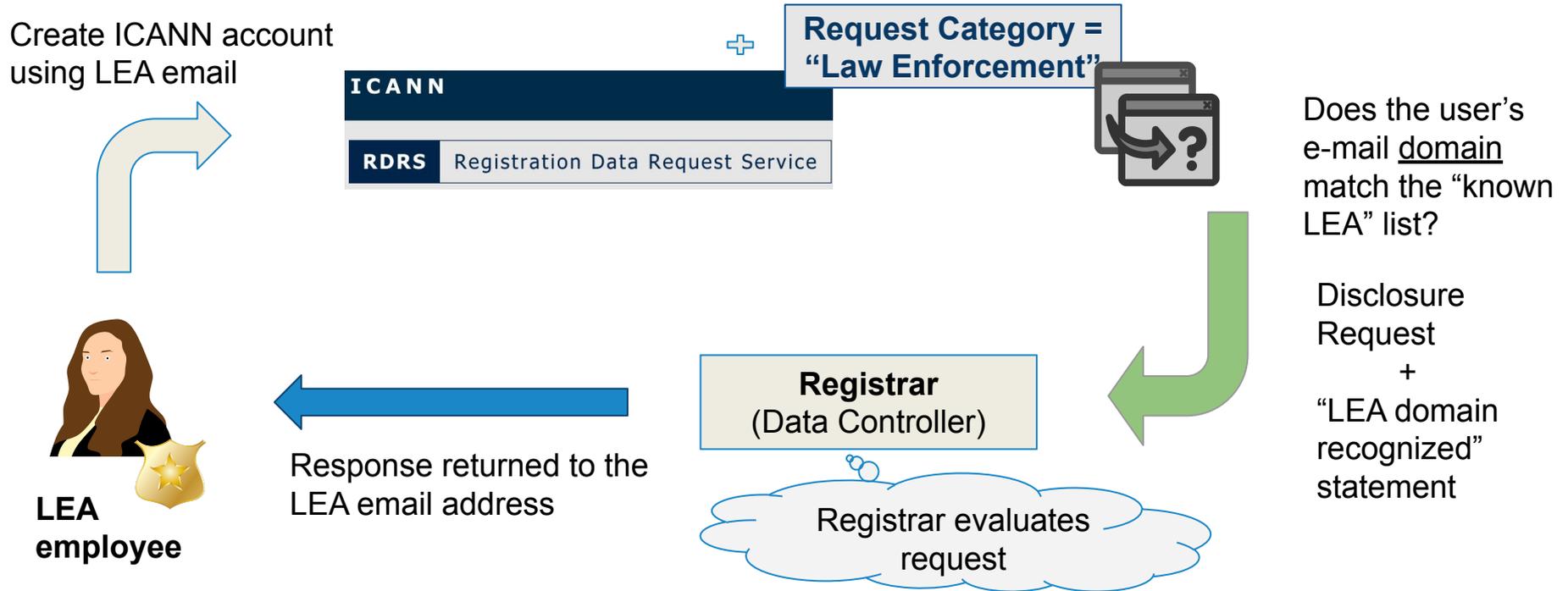
Authenticating Law Enforcement Requests: "Long Term"

Connecting enterprise Law Enforcement Agency (LEA) portals to ICANN Registration Data Request Service (or successor systems)

Employee Login

Law Enforcement Portal(s)

INTERPOL

Authentication Token

ICANN

RDRS Registration Data Request Service

Disclosure Request + Authentication Token

LEA employee

Registrar responds to Requestor via normal RDRS process (e.g. email)

Registrar (Data Controller)

Registrar evaluates request

Authenticating Law Enforcement Requests: "Short Term"

Providing known LEA domains to ICANN to incorporate w/in RDRS (or successor systems)

Create ICANN account using LEA email

ICANN

RDRS Registration Data Request Service

Request Category = "Law Enforcement"

Does the user's e-mail domain match the "known LEA" list?

Disclosure Request + "LEA domain recognized" statement

Registrar (Data Controller)

Registrar evaluates request

LEA employee

Response returned to the LEA email address

Authenticating Law Enforcement Requests: Interpol

Presentation by: **Matthew Errington,** Interpol

Global Digital Police Identity (GDPI)

Authenticating Law Enforcement Requests: ICANN org

Discussion by: **Eleeza Agopian**, ICANN org

                              Vice President Strategic Initiatives

Next Steps on RDRS and SSAD Policy Recommendations

RDRS / SSAD Updates

Recent Developments

- During ICANN84 in Dublin the ICANN Board [resolved](#) (30 October 2026) to **continue operations of the RDRS for up to 2 years** "*while the community continues its deliberations regarding the future of the service and related policy recommendations*"

- The GNSO Council and ICANN Board have been discussing **next steps on SSAD recommendations** as reflected in a recent [GNSO Council letter](#) (2 March 2026):
  - The ICANN Board is expected to non-adopt the pending SSAD recommendations, triggering the provisions of ICANN [Bylaws Annex A](#), Section 9
  - This will enable the **GNSO Council to provide Supplemental Recommendations** which would improve the SSAD Recommendations, which it intends to deliver "*within months, not years*"
  - The [Findings of the RDRS Standing Committee](#) (10 Nov. 2025) are expected to serve as a basis

- During ICANN85, the GNSO Council will hold a [Session](#) to discuss these next steps on Thursday 12 March at 9:00am in Room 206 A/B

SSAD Next Steps for the GAC

- The GAC expects that ICANN's Advisory Committees will be involved in the drafting of SSAD Supplemental Recommendations

- The GAC will continue to bring public policy perspectives on the establishment of a permanent System for Access and Disclosure of Registration Data (SSAD) consistent with:
  - The GAC Minority Statement (24 August 2020) on the EPDP Phase 2 Recommendations
  - The GAC Comments (29 Sep. 2025) on the RDRS Standing Committee Report
  - The GAC Comments (15 Dec. 2025) on ICANN's Policy Alignment Analysis

GAC Goals Regarding RDRS and SSAD

- The GAC has consistently stressed:

  - **The importance to enhance the RDRS** while it continues to be in operation, including:
    - Better integration for registrars' systems and requestors' systems with the request portal
    - User experience improvements to reduce user friction

  - The importance of achieving the **shared vision with the ICANN Board of an RDRS or Successor System** that would provide:
    - Mandatory registrar participation
    - A requirement for registrars with affiliated privacy and proxy services to also respond to RDRS requests for underlying privacy/proxy customer contact data as part of their disclosure decision process
    - RDRS links in RDAP responses to promote awareness
    - Option for country code top-level domains (ccTLDs) to voluntarily participate in the RDRS

Considerations for the ICANN85 Mumbai Communiqué

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GAC Mumbai Communiqué Consideration

- Issues of Importance to the GAC
  - Urgent Requests
    - Timeline
    - Authentication
  - RDRS/SSAD next steps
  - PPSAI