

# gTLD Registration Data Issues

## GAC Speakers:

Gabriel Andrews (United States, PSWG)  
Martina Barbero (European Commission)  
David Bedard (Canada)  
Owen Fletcher (United States)

## Guest Speakers:

Janelle McAlister (ICANN org)  
Marc Anderson (Verisign, SSAD SRT)  
Maciej Korczyński (Grenoble INP–Ensimag)  
Barbara Pearse (ccNSO DASC, .NZ)

ICANN87  
18 October 2026

**I C A N N | G A C**

Governmental Advisory Committee

# Agenda

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- 1. Law Enforcement Authentication**
- 2. SSAD Supplemental Recommendations**
- 3. Privacy/Proxy Accreditation Consensus Policy Discussions Update**
- 4. 15-day Verification Timeline**
- 5. GAC Bali Communiqué Consideration**

# Law Enforcement Authentication for Disclosure Requests

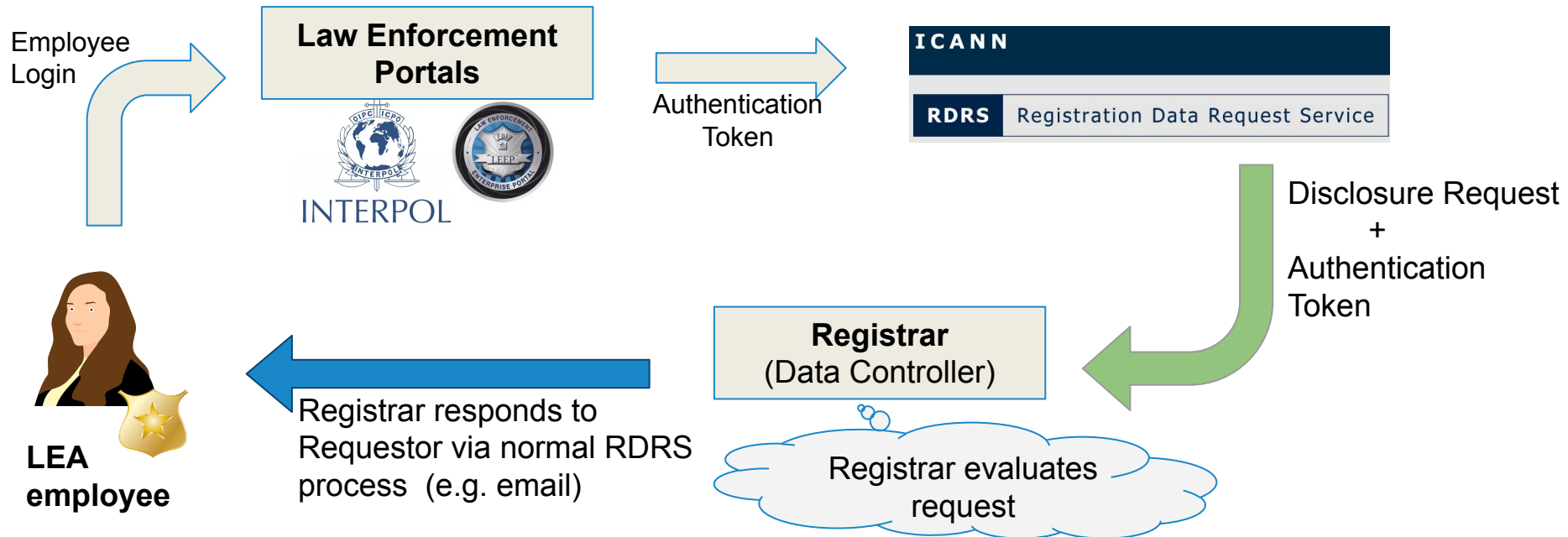
# Background on Law Enforcement Authentication

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- ICANN's 2022 Operational Design Assessment of the Standardized System for Access & Disclosure (SSAD) anticipated operational costs of ~\$14M - \$106M/Year. Authentication challenges were a key cost driver.
  - This led to conversations about whether/how SSAD costs might be reduced.
- 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."*

# Law Enforcement Portals as Authentication Provider

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



# Law Enforcement Portals as Authentication Provider

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

“Proof of Concept”  
Testing

Employee  
Login

**Law Enforcement  
Portals**

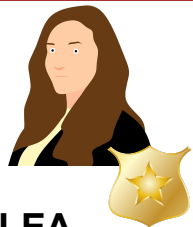


Authentication  
Token

**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

# Urgent Requests for Disclosure of Registration Data

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## Latest Developments on LEA Authentication Mechanisms

- The GAC welcomed the ICANN Board [comments](#) (20 April 2026) on Issues of Importance in the GAC Mumbai Communiqué, **suggesting that a “testing group or other transparent, multistakeholder effort” be led by ICANN org** *“to support preparation of contracted parties and requestors to implement the mechanism”*
- In a [correspondence to the GNSO](#) (13 May 2026) the ICANN Board stated that it had **“asked ICANN org to take the lead in advancing further work on the technical requirements for authentication and proof-of-concept testing with law enforcement agencies”**
- In June 2026, ICANN Org convened an Input Group supports the development of a proof of concept for an operationally effective approach to authenticating law enforcement requestors.

Update by: **Janelle McAlister**, ICANN org  
Senior Program Manager

# **Standardized System for Access / Disclosure of Registration Data (SSAD) Supplemental Recommendations**

# SSAD Supplemental Recommendations

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## Background

- 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*”
- On March 12, 2026, the ICANN Board [resolved](#) (12 March 2026) to **non-adopt the original SSAD recommendations - enabling new work to be done by the GNSO [SSAD Supplemental Recommendations Team](#) (SRT)**
- **The SRT includes two GAC representatives from the GAC Small Group on Registration Data** as well as representatives across the community.
- The goal of the group is propose modifications to the original 18 SSAD recommendations based on changes outlined in the [RDRS Standing Committee’s Final Findings Report](#) **by February 2027**

## GAC Priorities for the SSAD

The GAC has [communicated](#) its priorities to the Board on what policy and technical elements a successor RDRS system should contain, they include:

- A **permanent** system to facilitate requests to gTLD registrars for disclosure of domain registration data
- **Mandatory participation** by all gTLD registrars with optional participation by ccTLD operators
- The ability for requesters to **meaningfully submit** requests for underlying data that is held by **privacy or proxy** services
- The technical processing of **Urgent Requests by authenticated users** and the **full implementation** of the recent updates to the Registration Data Policy on urgent requests

## Next Steps for the GAC:

- Agreement of meaningfully handling of privacy and proxy requests:
  - *5.7.3 Where disclosure request regards a domain registered through a privacy or proxy service, the Contracted Party MUST ensure the request is evaluated and responded to in line with the requirements of the Consensus Policy on privacy/proxy registrations*
- GAC seeking confirmation from the Board that updates to the urgent requests policy will be operationalized once SSAD recommendations are approved and implemented
- GAC is also aiming to have this understanding reflected directly within the updated SSAD recommendations

# SSAD Supplemental Recommendations

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## Update on the work of the SSAD Supplemental Recommendations Team (SSAD SRT)

Presentation by: **Marc Anderson**, Verisign  
GNSO SSAD SRT Lead

## Next Steps

- The SSAD SRT will be meeting for three sessions over the course of ICANN87 to reach broad agreement on SSAD recommendations
- The SSAD SRT is expected to publish its initial recommendations for Public Comment shortly after ICANN87 with a view to completing its work by early 2027.
- The GAC Representatives in the SSAD SRT will circulate a Draft GAC Comment on these initial recommendations taking particular note of GAC priorities for the SSAD

# Accreditation of Privacy/Proxy Services

# Accreditation of Privacy/Proxy Services

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## Descriptions:

- Privacy Services: Registrant is still listed as Registered Name Holder, but contact information shown in data records is that of the privacy service.
- Proxy Services: The proxy service is listed as the Registered Name Holder, and its contact information is also shown. (The proxy service licenses use of the domain to its customer/user.)

# Privacy/Proxy Services: Example of public data (no P/P used)

**CentralOps.net** Advanced online Internet utilities

Utilities  
▼  
Domain Dossier  
Domain Check  
Email Dossier  
Browser Mirror  
  
Ping  
Traceroute  
Nslookup  
AutoWhois  
AnalyzePath

Unassigned  
URL of the ICANN Whois Inaccuracy Complaint Form: <https://www.icann.org/wicf/>  
>>> Last update of whois database: 2020-03-19T19:20:56Z <<<

Queried **whois.corporatedomains.com** with "cnn.com"...

Domain Name: cnn.com  
Registry Domain ID: 3269879\_DOMAIN\_COM-VRSN  
Registrar WHOIS Server: whois.corporatedomains.com  
Registrar URL: [www.cscprotectsbrands.com](http://www.cscprotectsbrands.com)  
Updated Date: 2018-04-10T16:43:38Z  
Creation Date: 1993-09-22T04:00:00Z  
Registrar Registration Expiration Date: 2026-09-21T04:00:00Z  
Registrar: CSC CORPORATE DOMAINS, INC.  
Registrar IANA ID: 299  
Registrar Abuse Contact Email: [domainabuse@cscglobal.com](mailto:domainabuse@cscglobal.com)  
Registrar Abuse Contact Phone: +1.888.780.2723  
Domain Status: clientTransferProhibited <http://www.icann.org/epp#clientTransferProhibited>  
Domain Status: serverDeleteProhibited <http://www.icann.org/epp#serverDeleteProhibited>  
Domain Status: serverTransferProhibited <http://www.icann.org/epp#serverTransferProhibited>  
Domain Status: serverUpdateProhibited <http://www.icann.org/epp#serverUpdateProhibited>  
Registry Registrant ID:  
Registrant Name: Domain Name Manager  
Registrant Organization: Turner Broadcasting System, Inc.  
Registrant Street: One CNN Center  
Registrant City: Atlanta  
Registrant State/Province: GA  
Registrant Postal Code: 30303  
Registrant Country: US  
Registrant Phone: +1.404.827.5000  
Registrant Phone Ext:  
Registrant Fax: +1.404.827.1995  
Registrant Fax Ext:  
Registrant Email: [tmgroup@turner.com](mailto:tmgroup@turner.com)  
Registry Admin ID:  
Admin Name: Domain Name Manager  
Admin Organization: Turner Broadcasting System, Inc.  
Admin Street: One CNN Center  
Admin City: Atlanta  
Admin State/Province: GA  
Admin Postal Code: 30303  
Admin Country: US  
Admin Phone: +1.404.827.5000  
Admin Phone Ext:  
.....

# Privacy/Proxy Services: Example of “Privacy Service” used

**Central Ops .net** *Advanced online Internet utilities*

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**Utilities**

- Domain Dossier
- Domain Check
- Email Dossier
- Browser Mirror
- Ping
- Traceroute
- Nslookup / Dig

Queried **whois.comlaude.com** with "cnn.com"...

```
Domain Name: cnn.com
Registry Domain ID:
Registrar WHOIS Server: whois.comlaude.com
Registrar URL: https://www.comlaude.com
Updated Date: 2025-04-22T17:03:07Z
Creation Date: 1993-09-22T00:00:00Z
Registrar Registration Expiration Date: 2027-09-21T00:00:00Z
Registrar: NOM-IQ Ltd dba Com Laude
Registrar IANA ID: 470
Domain Status: Registry Lock Service https://www.icann.org/epp#Registry Lock Service
Domain Status: clientDeleteProhibited https://www.icann.org/epp#clientDeleteProhibited
Domain Status: clientTransferProhibited https://www.icann.org/epp#clientTransferProhibited
Domain Status: clientUpdateProhibited https://www.icann.org/epp#clientUpdateProhibited
Domain Status: serverDeleteProhibited https://www.icann.org/epp#serverDeleteProhibited
Domain Status: serverTransferProhibited https://www.icann.org/epp#serverTransferProhibited
Domain Status: serverUpdateProhibited https://www.icann.org/epp#serverUpdateProhibited
Registry Registrant ID: REDACTED
Registrant Name: REDACTED
Registrant Organization: Turner Broadcasting System, Inc.
Registrant Street: REDACTED
Registrant City: REDACTED
Registrant State/Province: GA
Registrant Postal Code: REDACTED
Registrant Country: US
Registrant Phone: REDACTED
Registrant Phone Ext: REDACTED
Registrant Fax: REDACTED
Registrant Fax Ext: REDACTED
Registrant Email: cnn.com-Registrant@anonymised.email
```

The Registrant is the same, but...

Phone # is hidden

Email is functional, but obfuscated

# Privacy/Proxy Services: Example of “Proxy Service” used

## ICANN | LOOKUP

### Registration data lookup tool

Enter a domain name or an Internet number resource (IP Network or ASN)

[Frequently Asked Questions \(FAQ\)](#)

exampleproxy.com

Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN [Privacy Policy](#), and agree to abide by the website [Terms of Service](#) and the [registration data lookup tool Terms of Use](#).

#### Registrant:

**Handle:** 1

**Name:** Registration Private

**Organization:** Domains By Proxy, LLC

**Kind:** individual

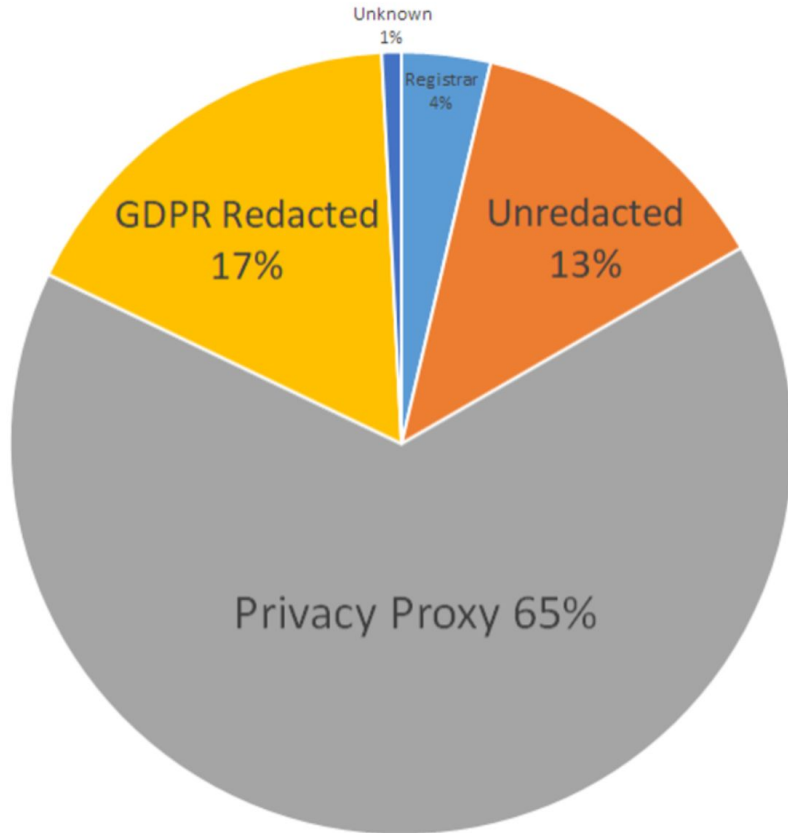
**Mailing Address:** DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

**Contact Uri:** <https://www.godaddy.com/whois/results.aspx?domain=exampleproxy.com>

**When a Proxy Service is used,  
the Proxy Service \*IS\* the  
Registrant.**

**Any “Registrant” info shown  
belongs to the Proxy Service  
itself.**

## Prevalence of Privacy/Proxy Services - June 2020 Example, ~1,000+ fraud referrals



Registrant Information Status of Referred Domains

- Privacy Proxy
- GDPR Redacted
- Unredacted
- Registrar
- Unknown

## Background

- GAC is participating in the GNSO Implementation Review Team (IRT) on Privacy and Proxy Service Accreditation Issues (PPSAI).
  - PPSAI Final Report recommendation: *“Registrars are not to knowingly accept registrations from privacy or proxy service providers who are not accredited through the process developed by ICANN.”*
- Currently, PPSAI IRT is reviewing draft Consensus Policy text on privacy/proxy services
- Separately, SSAD SRT draft text would ensure consideration of privacy/proxy disclosure requests submitted through SSAD/RDRS

## “Pass-through” of policy requirements

### 3. Sponsorship of Registered Names for Which Privacy Services or Proxy Services Are Provided

3.1 Registrar MUST ensure that any Privacy Service or Proxy Service provided for a Registered Name it Sponsors complies with this Policy and applicable law, whether provided by the Registrar, an Affiliate, a Reseller, or another third party.

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### 3.3 Service Provider Agreements<sup>2</sup>

3.3.1 Registrar MUST enter into and maintain with each Service Provider a Service Provider Agreement that enables the Registrar to perform all obligations under this Policy.

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- [3.3.3.4] Agreements must “...require the Service Provider to impose equivalent obligations, through binding written agreements, on any downstream provider...”

## Disclosure requests

### 11. Disclosure Requests

11.1 Registrar **MUST** respond, or **MUST** ensure that Service Providers respond, to Disclosure Requests in accordance with the terms published pursuant to Section 4 of this Policy and this Section 11.

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11.4 Registrar **MUST** consider, or **MUST** ensure that each Service Provider considers, each Disclosure Request submitted to the Service Provider on its merits, considering the specific rationale and basis for each request.

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- 30-day timeline for responses to disclosure requests, 24 hours for urgent requests
  - Matches Registration Data Policy requirements

Other draft language covers:

- Establishing abuse reporting contacts at each privacy/proxy service provider
- Remediation in cases of non-compliance
- Other issues (data escrow, relay of information to P/P customers, etc.)

## Next Steps

- The PPSAI IRT has an in-person meeting this week, on Wednesday, October 21
- Based on IRT input, ICANN org will propose revised draft text for the Consensus Policy
- Discussion and iteration will continue until end of the year
- Aim is to open Public Comment on the PPSAI draft Consensus Policy in January 2027
- GAC to continue IRT engagement and may consider Public Comment submission

# Registration Data Accuracy: 15-day Verification Timeline

# Background: Registration Data Accuracy

- [GAC Principles Regarding gTLD WHOIS Services](#) (28 March 2007), reiterated in the [ICANN60 Abu Dhabi Communiqué](#) (1 November 2017): “**gTLD WHOIS services should provide sufficient and accurate data about domain name registrations and registrants** subject to national safeguards for individuals' privacy [...]”
- [GAC expresses serious concerns to the GNSO](#) (22 June 2020) regarding issues **not addressed in EPDP Phase 2**, including Registration Data Accuracy and requests in its [GAC Minority Statement on the EPDP Phase 2 Final Report](#) (24 August 2020) that accuracy be addressed in subsequent phases.
- The GAC takes part in the [GNSO Accuracy Scoping Team](#) (formed in Oct.2021, paused in Nov. 2022)
- The [GAC provides input on the GNSO’s threshold questions](#) (14 Feb. 2025) to determine next steps
- The GNSO Council approves the [recommendation](#) of the GNSO Accuracy Small Team on Registration Data (31 July 2025) to: “*examining the existing process for validating and verifying registration data under the 2024 Registrar Accreditation agreement and the potential impact on registrants if this process is modified*”
- In the [ICANN84 Dublin Communiqué](#), the **GAC urges the GNSO to identify an implementation path** for the Accuracy Small Team recommendations (3 November 2025)

# Background: 15-day Verification Timeline

- in the [GAC Mumbai Communiqué](#) (16 March 2026) the GAC:
  - Expresses *“its strong interest in engaging further with the Board and the Contracted Parties on how to address – in a swift and effective manner – the current 15-day timeline for registrars to validate and verify registrants contact information”*
  - Notes from the [INFERMAL study](#) (8 Nov. 2024) that *“when the validation of registrant information takes place during the account creation or before the domain purchase, it is associated with a 70% decrease in malicious registrations”*
  - Proposes that: *“To mitigate DNS Abuse, verification of registrant contact information should take place before a newly registered domain name can become accessible through the DNS. A possible path to be further explored in this regard is contract amendments, and the GAC will continue to consider the best path for efficient implementation”*
- The [GAC Chair requests](#) (11 May 2026) to reconvene the trilateral setting, between the GAC, the ICANN Board and the GNSO to address this matter.

# 15-day Verification Timeline - Recent Developments

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- Following the [ICANN86 informational session \(GAC/GNSO\)](#) (9 June 2026), in its [Seville Communiqué](#) (15 June 2026) the GAC stressed:
  - The need to review the current rules, particularly ahead of the delegation of new gTLDs strings
  - The need to take into account potential operational and financial challenges to registrars
  - The expected focus on identifying practical implementation pathway given substantial research already undertaken
  - The Importance of early involvement of the ICANN Board in these discussions
- Following the ICANN86 meeting, in [correspondence to the GAC Chair](#) (25 August 2026) and during the [Board/GAC Call on the Seville Communiqué](#) (16 July) the ICANN Board:
  - Identified contractual negotiations and policy development as the two available mechanisms for modifying the 15-day verification timeline
  - Expressed openness to considering other approaches

# 15-day Verification Timeline - Recent Developments

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- During a **recent GAC/GNSO Topic Leads call** (28 September 2026):
  - **The Registrar Stakeholder Group (RrSG) clarified that it does not currently have a formal position** and is continuing to discuss the issue with its membership, including during ICANN87
  - The meeting explored operational **impacts on registrars and registrants, particularly the need to distinguish new registrations** from transfers and registration-data updates
  - The discussion highlighted **significant variations in current verification practices**:
    - Some registrars follow the 15-day process, while others verify email addresses at account creation
    - Some registrars apply additional fraud-prevention measures
    - Certain ccTLDs and regulated gTLDs impose more extensive verification
  - Given continued discussion of whether shortening the verification timeline would measurably reduce DNS Abuse, participants agreed that **further evidence from ccTLDs and other environments with more stringent requirements would be useful**.
  - GAC members are ready to share relevant ccTLD experience and available data concerning the impact of more stringent verification requirements, addressing the questions asked by the GNSO on this specific topic (in the context of GNSO-GAC bilateral).

# 15-day Verification Timeline - Expert Input And Discussion

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## Insights from the INFERMAL study on the impact of verification policies on DNS abuse

Presentation by: **Maciej Korczyński**

Professor of Computer Science at Grenoble INP–Ensimag

Author the INFERMAL Study

## Indications of verification practices and lessons learnt from the ccTLD space

Presentation by: **Barbara Pearce**

.NZ Domain Name Commissioner

Chair of the ccNSO DNS Abuse Standing Committee

# 15-day Verification Timeline - GAC Discussion and Next Steps

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## GAC discussion focusing:

1. Possible next steps for the GAC
  - a. Further discuss with the GNSO during the ICANN87 GAC-GNSO bilateral meeting (today after lunch)
  - b. Gather (further) input on the GNSO questions and provide feedback to the GNSO
  - c. ...



# Considerations for the ICANN87 Bali Communiqué