

GAC ICANN86 SEVILLE Communiqué: Issues of Importance (15 June 2026) - ICANN Board Comments for Board-GAC Interaction Group (BGIG) Call

Version 1.3

Updated (10 July 2026)

Issues of Importance

The table below contains the Board’s Comments related to the [GAC ICANN86 SEVILLE Communiqué](#) Issues of Importance, in support of the BGIG Meeting @ 16 July 2026. **This scorecard will not be presented to the Board for resolution.**

Issue Title <i>(from Communiqué)</i>	Issue Text <i>(from Communiqué)</i>	ICANN Board Comments
1. Review of Reviews	The GAC welcomed the update on the Draft Initial Report on a refreshed system of reviews from the co-chairs of the Review of Reviews Cross Community Group (CCG). The GAC takes note of the current proposal for Cadenced and On-Demand Reviews and the CCG’s proposed definition to the effect that “[t]he purpose of reviews is to assess whether ICANN is fulfilling its Mission, Commitments, and Core Values, as set out in the ICANN Articles and Bylaws, in a transparent and accountable manner.”¹ The GAC intends to continue its participation in the CCG, and reiterates its special interest in the topics indicated in the ICANN85 Mumbai Communiqué. In that context, the GAC wishes to highlight its view that: • Critical reviews that are fundamental to ICANN’s core mission—particularly the Security, Stability, and Resiliency (SSR) Review—must be explicitly accounted for in any revised review framework, with a binding commitment to regular, predictable cycles; • The CCG’s proposal should be consistent with a form-follows-function approach, as highlighted previously by the GAC, considering whether distinct reviews on the fulfilment of the mission and goals of ICANN (the suggested Accountability and Transparency Review) and on its organisation to achieve such goals (the suggested Structural Review) are really warranted or whether one single type of review for functional and organisational aspects could be a better fit, ensuring that the final proposal avoids duplications and unnecessary use of resources; and • The CCG’s proposal should include an estimate of the expected workload of all proposed reviews in a single timeline, to enable the community to consider the practical feasibility of the proposal.	• The Board is grateful for the GAC’s interest and commitment to participate in the dialogue to build a refreshed model of reviews for ICANN, one that enhances accountability, transparency and effectiveness. • In regard to the Security, Stability, and Resiliency (SSR) Review and other existing Specific Reviews: ○ The Board awaits the CCG's final recommendations and will continue to engage in the CCG process alongside the GAC and others. The Board notes that the Reviews CCG has a difficult task in determining which types of reviews are required to be specified in the Bylaws and for what purposes, and which types of topics could be incorporated under a broader scope of items available for review, while also keeping in mind the GAC's concerns about resource management and avoiding duplication. ○ Just as the SSR review is important to the GAC, the Board understands that other review topics are important to other constituencies, and the Reviews CCG continues to face the difficult task of finding a balance that meets the goals of all stakeholders. From the Board’s perspective any review recommended should be based on a clear purpose and need. The Board expects all community groups providing input to the Reviews CCG to not only be clear about these, but also to explain why that Review needs to be explicitly defined into the Bylaws as a recurring practice and obligation vs a more flexible approach based on scoping to present needs. Recognizing that bandwidth was one of the challenges that prompted the community dialogue on ICANN Reviews, the Board is mindful of the need for a review framework that is sustainable and uses the Community’s collective resources to tackle the most important issues. • The Board concurs that it would be beneficial to develop an integrated timeline mapping the scheduled and on-demand reviews, associated scoping work, and the potential impact of any deferrals.
2. DNS Abuse Mitigation	During the ICANN86 DNS Abuse session, the GAC welcomed presentations by the host country government (Spanish National Police) on cybercrime, Interisle Consulting Group on malicious registrations in the domain name market, the NetBeacon Institute on DNS abuse reporting and mitigation at scale, and Article 19 on the risks to registrant Freedom of Expression of domain name blocking. The GAC representatives in the Associated Domain Check (ADC) Policy Development Process (PDP) participated in four GNSO working sessions during ICANN86. They emphasized that evidence of past DNS abuse by the same registrant, and confirmed cases of ongoing malicious DNS abuse campaigns, should satisfy the evidentiary	• The Board acknowledges the positive update on the PDP Working Group (WG) on Associated Domain Checks and welcomes the broad community participation, including the invaluable contributions of GAC representatives. • The Board also appreciates the GAC’s perspectives on additional issues beyond those that could be addressed through the Issue Report. The Board agrees that there will remain further areas for community discussion, both within and beyond the policy development process. This could include consideration of the suggestions noted by the GAC, as well as other potential initiatives within ICANN’s remit.

1 Review of Reviews Cross Community Group (CCG), [Review of Reviews Initial Draft Report](#) (4 June 2026)

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	threshold required to trigger an associated domain check under the ADC policy. Several ideas that have emerged during PDP discussions, but which exceed the scope of the PDP, merit discussion later. These include: • Remedies for domain name registrants in the event of mitigation mistakes; • More data from registrars to enable evidence-based policy development, compliance enforcement, and best practices; • Transparency reporting; and • Collaboration across registrars, particularly when cybercriminals design DNS-abuse campaigns with registrations across multiple Registrars. The GAC notes that proactive efforts by registrars to prevent malicious registrations in the first instance should, in turn, lessen the burden of DNS abuse mitigation. Recalling the ICANN85 Mumbai Communiqué, and noting the exchange with the ICANN Board on a centralized reporting function, the GAC reiterates the need for a mandatory reporting requirement for DNS abuse by the registrars. The GAC welcomes the progress achieved to date in the ADC PDP, and appreciated hearing stakeholder views from across ICANN Supporting Organizations and Advisory Committees. Once sufficient progress has been made in PDP1, PDP2, which addresses safeguards for Application Programming Interface access to new registrants, should begin. The GAC reiterates its expectations for policy development and implementation, notably on PDP1, to take place before the delegation of new strings from the 2026 application round.	• As with the items previously identified as future areas of work in the Issue Report, including reporting requirements for Contracted Parties, the Board emphasizes that careful evaluation and prioritization of these topics is necessary to ensure that any future work is appropriately scoped and supported by the community. In addition, it is important to ensure that adequate community and staff resources are available to support such work, given the Council’s broad portfolio of responsibilities. The Council has started a pilot/test run mechanism for prioritizing its work, and DNS Abuse mitigation will be taken into consideration. • As with the GAC, the Board recognizes the importance of proactive initiatives targeting malicious registrations and agrees that such efforts can complement reactive measures in addressing real-world challenges. ICANN Org continues to do its part by identifying and pursuing opportunities to further enhance enforcement related to existing requirements. For instance, ICANN Contractual Compliance is developing a proactive DNS Abuse mitigation enforcement framework that leverages a data-driven model to identify contracted parties with elevated DNS Abuse indicators. This framework is intended to identify potential noncompliance with DNS Abuse mitigation obligations that may not surface through complaints or audits, thereby complementing existing complaint-driven and audit-based processes. The framework incorporates key performance indicators and metrics that will be shared with the community. The initial concept for this framework was presented at the 2026 Contracted Parties Summit. • The Board also takes note of the GAC’s suggestions regarding enhanced transparency, including the potential exploration of a centralized reporting mechanism for DNS Abuse complaints. The Board recognizes that such proposals could enhance understanding of DNS Abuse trends and help inform future work. The Board notes that further due diligence, including a review of work being undertaken by third parties such as FIRST and MA3WWG, as well as multistakeholder discussion, would be beneficial before advancing specific solutions. • The Board recognizes the community’s emphasis on narrowly focused PDPs, ideally leading to rapid and effective outcomes. This emphasis means that certain topics will need to be prioritized. However, the successful completion of rapid and effective PDPs will hopefully create the necessary space to consider further mitigation actions against DNS Abuse. • The Board urges the ICANN organization to provide all necessary support to enable a timely initiation and conduct of relevant PDPs, and stands ready to assist and support the successful conclusion of this important project.
3.a. Domain Name Registration Data: Urgent Requests and Requestor Authentication	The GAC reiterates its observations made in the ICANN85 Mumbai Communiqué and welcomes ICANN’s recent publication of the 24-hour response timeline for urgent requests within ICANN’s Registration Data Policy. The GAC appreciates ICANN org’s collaboration with the PSWG to develop law enforcement authentication mechanisms for registration data disclosure requests, as well as ICANN’s intent to manage related community engagement through an “input group”. The GAC urges all relevant ICANN community members to act expeditiously to finalize aspects of law enforcement authentication so that the urgent requests policy can take effect. The GAC further notes the importance of providing anticipated timelines for the completion of the authentication mechanisms as the input group conducts its work. The GAC stresses that the authentication mechanisms should be incorporated into the Registration Data Request Service (RDRS) or its successor system once they are operational. The GAC emphasizes that pragmatic and implementation-oriented approaches for	• The Board acknowledges that a law enforcement authentication mechanism is critical for the enforcement of the recently approved 24-hour response timeline for urgent requests for nonpublic gTLD registration data and supports pragmatic and timely implementation of an authentication mechanism to effectuate the urgent request policy. • ICANN org recently announced a call for volunteers to participate in the Input Group: Law Enforcement Agency Authentication Mechanisms, a community effort that will begin in July. This group will help inform development of a proof of concept for authenticating law enforcement. • The Board encourages the GAC/PSWG’s participation in ICANN’s Input Group: Law Enforcement Authentication Mechanisms and continued involvement in this work to ensure alignment with the System for Standardized Access/Disclosure Supplemental Recommendations Team on related modifications to the SSAD Policy Recommendations for law enforcement authentication and authentication of other requestor communities.

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	authentication should be explored while the input group and System for Standardized Access/Disclosure (SSAD) Supplemental Recommendations Team conduct their work to enable swift operationalization of the 24-hour response requirement. The GAC calls on the GNSO’s SSAD Supplemental Recommendations Team to work toward outcomes that enable ICANN policy to distinguish between authenticated and unauthenticated requests, as authentication could be useful even when a disclosure request is not “urgent” as defined in the urgent requests policy.	
3.b. Domain Name Registration Data: Registration Data Request Service and System for Standardized Access/Disclosure	The GAC takes note of the experience gained from the Registration Data Request Service (RDRS) pilot, the findings of the RDRS Standing Committee, and recalls the GAC’s comments on the ICANN org Policy Alignment Analysis, and the comments issued in GAC Communiqués since ICANN82. The GAC reiterates that ICANN should maintain a permanent centralized mechanism to facilitate requests to gTLD registrars for disclosure of domain registration data. The mechanism should require mandatory participation by gTLD registrars, provide better integration for registrars’ systems and requestors’ systems, allow for participation by privacy and proxy services affiliated with registrars, and support urgent request processing and the law enforcement authentication mechanisms being developed by the PSWG. Either a substantially improved RDRS or a successor system should meet these requirements. The GAC continues supporting efforts to explore voluntary participation by all parts of the ccTLD ecosystem in the RDRS. The GAC looks forward to engaging in constructive dialogue with members of the GNSO’s SSAD Supplemental Recommendations Team to achieve the goal of completing the Team’s work by early 2027, with a view to enable the timely implementation of a permanent and effective registration data request mechanism.	• The Board also appreciates the experience gained from the Registration Data Request Service (RDRS) pilot, the findings of the RDRS Standing Committee, and comments received from the GAC and other community members on the RDRS Policy Alignment Analysis. • The Board acknowledges the GAC’s comments on possible future improvements for RDRS or a successor system as identified in the RDRS Policy Alignment Analysis and in the GAC Communiqués issued since ICANN82. • The Board welcomes the GAC’s input on the System for Standardized Access/Disclosure (SSAD) Supplemental Recommendations and also looks forward to constructive dialogue with the Supplemental Recommendations Team (SRT) that will result in a final set of recommendations that include the following, for submission to the Board in early 2027: ○ Mandatory registrar participation in mechanisms for requesting gTLD nonpublic registration data, which align with the presumption that consensus policies are binding on all contracted parties. ○ Confirmation of how the mechanism can be used to make and respond to requests for the underlying nonpublic registration data for privacy/proxy domains. ○ Inclusion of service level agreements that require registrars to provide substantive responses to disclosure requests on an agreed timeline for urgent requests that are authenticated, as originally envisioned in the SSAD recommendations. ○ An authentication mechanism for law enforcement authorities and a phased approach for federated authentication for other user groups to facilitate urgent request responses, as originally envisioned in the SSAD recommendations. • The Board notes that ICANN org recently announced a call for volunteers to participate in the Input Group: Law Enforcement Agency Authentication Mechanisms, a community effort that will begin in July. This group will help inform development of a proof of concept for authenticating law enforcement, which is critical for enforcement of the recently approved 24-hour response timeline for urgent requests. • The Board also notes that ICANN continues to explore options for voluntary ccTLD participation in RDRS or any successor system, as the SRT and community work to finalize SSAD Supplemental Recommendations.
3.c. Domain Name Registration Data: Privacy and Proxy Services	The GAC urges the Privacy and Proxy Services Accreditation Issues (PPSAI) Implementation Review Team (IRT) to work toward establishing an accreditation system that helps prevent misuse of privacy and proxy services. For example, registration data records should reliably indicate whether a privacy or proxy service was used in a registration and provide information about the service used, so that parties with a legitimate interest know where they can direct inquiries. This	• The Board shares the GAC’s interest in seeing ICANN’s work with the Privacy and Proxy Services Accreditation Issues (PPSAI) Implementation Review Team (IRT) continue to work toward establishing an accreditation system, and acknowledges the GAC’s interest in privacy and proxy service use being noted in the registration process, regardless of the number of resellers or other intermediaries involved in a registration. • The Board also acknowledges the GAC’s emphasis on the importance of the PPSAI Policy Development Process

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	information should be available regardless of how many resellers or other intermediaries are involved in a registration. The GAC underscores the importance of the PPSAI Final Report recommendation which states, “Registrars are not to knowingly accept registrations from privacy or proxy service providers who are not accredited through the process developed by ICANN.” The privacy and proxy service accreditation system should provide a path to address cases of unaccredited operators offering their own privacy or proxy services, regardless of whether such unaccredited services are offered by affiliates of registrars, resellers, and other intermediaries operating within the registration chain. In addition, the GAC reiterates that the RDRS or its successor system should integrate support for disclosure requests related to data underlying privacy and proxy registrations.	(PDP) Working Group’s (WG) Final Report statement that, “Registrars are not to knowingly accept registrations from privacy or proxy service providers who are not accredited through the process developed by ICANN” to guide the implementation. • The Board understands one topic of discussion in the IRT is a path for unaffiliated operators offering their own privacy and proxy services to become accredited, regardless of whether the services are offered by affiliates of registrars, resellers, and other intermediaries operating within the registration chain. The Board notes that ICANN org is currently drafting Consensus Policy language for the PPSAI IRT’s that addresses this issue. • The Board also agrees that the RDRS or its successor system should integrate support for disclosure requests related to data underlying privacy and proxy registrations and understands that ICANN org is already coordinating this effort between the System for Standardized Access/Disclosure (SSAD) Supplemental Recommendations Team and PPSAI Team.
3.d. Domain Name Registration Data: Accuracy of Domain Name Registration Data	The GAC appreciated the opportunity to discuss with the GNSO the matter of the 15-day timeline for gTLD registrar verification of registrant contact information. The GAC reiterates the importance of tackling this issue for the effective prevention and mitigation of DNS Abuse as noted by GAC in its communiqués issued during ICANN83 Prague, ICANN84 Dublin and ICANN85 Mumbai. The GAC understands that the current 15-day timeline for registrars to verify registrant contact information, as required under the Registrar Accreditation Agreement (RAA), originates from rules established in 2001. The GAC will pursue a process with the aim of having these requirements revised so that such verification occurs prior to the activation of a newly registered domain. The GAC is eager to review the current rules, particularly ahead of the delegation of new gTLDs strings, taking into account all relevant aspects of this issue, including potential operational and financial challenges to registrars. Existing research and reports, such as the report of the GNSO Small Team on Accuracy and the INFERMAL report, DNS Abuse Mitigation Final Issue Report and SAC058, SAC115 and SAC129 reports, should also be taken into account. Recognizing the substantial research already undertaken and the recommendations made, the GAC believes that discussions should focus on identifying practical implementation pathways. Given the potential need for contractual amendments, the GAC considers important the early involvement of the ICANN Board in these discussions with the Contracted Parties and the GAC.	• Based on the GNSO Council’s briefing to the GAC on this subject at ICANN86, the Board encourages the GAC to further engage on the topic and where applicable, identify and consider additional data sources that help determine the scope of the issue. • The Board would like to clarify that the 15-day verification timeline originates from the 2013 Registrar Accreditation Agreement (RAA). • In order to create new obligations or amend existing ones, there are only two available mechanisms: contractual amendments or policy development. ○ Contractual negotiations are generally speaking, a bilateral process between ICANN org and the registrars. ○ Policy development is initiated by the GNSO Council. The Board notes that the 15-day verification topic is captured in the GNSO’s Issue Report on DNS Abuse Mitigation, facilitating a potential, future PDP on the subject. • The Board is aligned with the GAC’s goal of further mitigating DNS Abuse. The Board acknowledges the GAC’s prioritization of certain topics, two of which are to be addressed in the GNSO’s two already-initiated PDPs on DNS Abuse Mitigation. The Board would welcome the GNSO’s progress on its prioritized PDPs before initiating new work on DNS Abuse.
4. Applicant Support Program	The GAC continues to closely monitor implementation of the Applicant Support Program (ASP) for the New gTLD Program: 2026 Round, which it views as a critical mechanism for maximising diverse participation in the DNS ecosystem.	• The Board thanks the GAC for its continued interest in the Applicant Support Program (ASP) and shares the objective of expanding participation in the New gTLD Program through support for qualified applicants. • The Board notes the GAC's continued interest in additional Registry Operator fee reductions for supported

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	The GAC acknowledges the extensive work undertaken by the Board to date and notes its stated position at ICANN86, that it has exhausted the operational and financial means within its direct purview regarding the ASP application fee reduction beyond 75% for the New gTLD Program: 2026 Round. The GAC notes, however, that continued efforts remain essential to address financial and accessibility barriers facing applicants from underserved and under-represented regions. In particular, the GAC encourages the Board to outline concrete steps to maximise use of the Applicant Support Directory and to facilitate, through ICANN's Global Stakeholder Engagement Team and in collaboration with willing GAC members, connections between qualified applicants and potential sources of development finance. Additionally, recalling ICANN77 GAC Advice, the GAC reiterates its recommendation that the Board take steps to substantially reduce or eliminate base Registry Operator Fees, pursuant to the ASP Handbook section 6.6.7, to expand financial support for applicants from underserved and under-represented regions. In light of indications that the number of qualified ASP applications may exceed initial projections, the GAC further encourages the Board to remain open to future re-evaluation of support measures and fee adjustments should demand from underserved and under-represented regions prove greater than anticipated.	applicants. Consistent with the Board's adoption of Supplemental Recommendation 17.2, the Base Registry Agreement for the New gTLD Program: 2026 Round includes reduced Registry-Level Fixed Fees for supported applicants. Under the adopted 2026 Base Registry Agreement, supported Registry Operators receive a 75% reduction in the Registry-Level Fixed Fee during the first year of operation, a 50% reduction in the second year, and a 25% reduction in the third year, before transitioning to the standard fee schedule in the fourth year. The Board notes that Supplemental Recommendation 17.2 did not prescribe a specific level of Registry Operator fee reduction and the resulting Registry-Level Fixed Fee provisions were developed through the established implementation process. The Board understands that this included research on Globally Recognized Procedures for Financial Assistance Programs, consultation with the Subsequent Procedures Implementation Review Team (IRT) ASP Sub-Track, and public comment, prior to Board approval of the 2026 Base Registry Agreement. • The Board also notes that the ASP Funding Plan was developed to provide certainty and predictability regarding the financial support available to qualified applicants, including application fee reductions, Registry Operator fee reductions, access to an applicant counselor, and other support mechanisms. The financial support model reflected in the ASP Funding Plan was informed by the GNSO Guidance Process on Applicant Support, consultation with the Subsequent Procedures IRT ASP Sub-Track, and public comment on the Applicant Support Program Handbook, and has provided the framework for ASP implementation over the past two years. • The Board appreciates the GAC's continued support for the Applicant Support Program and welcomes continued dialogue as implementation progresses and additional information becomes available regarding program participation, supported applicants, and program outcomes.
5. Preserving Universal Connectivity and Addressing Ad-Hoc DNS Blocking	During GAC discussions, some members highlighted a systemic risk to Internet stability. It was presented that a number of private providers are independently implementing arbitrary, "ad-hoc" DNS-blocking mechanisms. The GAC, noting the SAC127 report “DNS Blocking Revisited”, encourages the ICANN Community to further the work and continue with the ongoing efforts to disseminate best practices to deal with DNS blocking and avoid fragmentation.	• The Board notes that the Internet by design allows for local decisions to be made by network operators. These decisions typically have local affect rather than global, where local is considered to be the network and customers of that network. ICANN has no authority or leverage over such local decisions. • The Board also notes that ICANN can offer education and guidance on the topic and has already done so. SSAC published SAC127, “DNS Blocking Revisited”, which offers suggestions and best practice surrounding the topic of DNS blocking.