

ICANN | GAC

Governmental Advisory Committee

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| Status | Final |
| Distribution | Public |
| Date | 15 December 2025 |

Governmental Advisory Committee Comments on the Registration Data Request Service (RDRS) Policy Alignment Analysis

These GAC comments are proposed in response to the [ICANN Public Comment proceeding](#) on “Registration Data Request Service (RDRS) Policy Alignment Analysis” opened on 30 October 2025 and closed on 15 December 2025.

The GAC welcomes the *Registration Data Request Service (RDRS) Policy Alignment Analysis* and generally endorses the *Road Map for Aligning RDRS-Related Policies with the ICANN Board’s Proposed Enhancements for RDRS*, although the GAC would appreciate delineation of a clear path for specifically achieving the requirement for mandatory registrar participation in RDRS regardless of the outcome of other policy processes related to the Privacy/Proxy Services and Urgent Requests for disclosure of Registration Data.

The GAC would also appreciate a clear indication that adequate resources will be set aside to achieve the necessary technical improvements such as those related to APIs.

The GAC notes the importance of ensuring that, once the policy frameworks for Privacy/Proxy Services and Urgent Requests are finalised, their implementation is technically integrated within the RDRS platform so as to optimize resource use and avoid the need for any new policy development to support such integration.

The GAC further encourages ICANN to ensure adequate and timely improvements to the RDRS so that it can effectively evolve into a permanent, centralized, and globally accessible mechanism for registration data disclosure.

The GAC generally supports the proposed enhancements addressed by the *Road Map* and considers these to be shared goals with the Board:

1. *Mandatory registrar participation, as presumed under most adopted consensus policies;*
2. *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;*

3. *Better integration for registrars' systems and requestors' systems with the request portal;*
4. *Inclusion of service level agreements (SLAs) that require registrars to provide substantive responses to disclosure requests on an agreed timeline for urgent requests;*
5. *Accreditation/authentication for law enforcement authorities with a phased approach for federated authentication for other user groups to facilitate urgent request responses; and*
6. *Operational options for country code top-level domains (ccTLDs) to voluntarily participate in the RDRS or a successor system*

However, regarding #4, the GAC requests further information on the elements of the SLAs from the ICANN Board. Additionally, regarding #3, and in order to enhance usability for both requestors and registrars, the GAC encourages ICANN org to assess the development of an API for the RDRS.

The GAC appreciates the effort of the Board and of ICANN staff to identify the possible policy development pathways toward achieving the outcomes described above. Where this document has highlighted opportunities for the GNSO to “revisit the EPDP Phase 2 recommendations” to achieve these shared goals, the GAC expects that such opportunities will be taken to achieve these outcomes swiftly. Should the GNSO ultimately not deem it feasible to utilize the policy paths identified within this document to achieve these goals, the GAC would anticipate and support the pursuit of these goals by other means, which could include but may not be limited to new policy development processes or contract amendments.

The GAC appreciates the initiative and impetus of this report, its clear call to action, and looks forward to contributing to the policy paths outlined therein to improve the Registration Data Request Service for all its users.