JULIA CHARVOLEN

Welcome to the GAC session on WHOIS in registration data issues on Tuesday 28 October at 10:30 UTC. Please note that this session is being recorded and is governed by the ICANN Expected Standards of Behavior, ICANN Community Participant Code of Conduct, and the ICANN Community Anti-Harassment Policy.

During this session questions or comments would only be read aloud if submitted in the proper form in the Zoom chat pod. Interpretation for this session will include all six humane languages and Portuguese. If you would like to speak during this session please raise your hand in the Zoom room and please remember to state your name for the record and the language you will be speaking, in case speaking a language other than English, and please speak at a reasonable pace to allow for accurate interpretation. I will now hand the floor over to Nico Caballero, GAC Chair, thank you and over to you.

NICOLAS CABALLERO

Thank you very much, Julia. welcome back everyone, welcome to the session on WHOIS and data protection policy. And for that I have the great pleasure of introducing our guests today, Jeff Bedser from the SSAC. I don't see Paul though, is he going to join us, Paul McGrady? Oh, he's on the way, okay thank you. We have

Sarah Wyld from Tucows, Dr. Devesh, am I pronouncing that well? Devesh, welcome. And our GAC shepherds are going to be Gabe Andrews. Gabriel Andrews, is he in the room? Oh virtual, I'm sorry, thank you for that.

We have David Bedard from Canada, Owen Fletcher from the US, and Martina Barbero. No, you're not going to be-- oh okay, okay, I'm sorry, that was a little glitch. But anyways, thank you everyone, welcome, and I'll give the floor now to David Bedard, Canada.

DAVID BEDARD

Thank you so much, Nico. It's very bright up here, but I hope everyone's well and it's good to theoretically see everybody. So we're here to discuss registration data issues that have been sort of perennial issues here in the GAC. I'll just run through the agenda really quickly, but these registration data issues concern Registration Data Request Service or the RDRS, the Privacy/Proxy Discussion Update, Urgent Requests for Disclosure of Registration Data, Accuracy of Registration Data, and then we will talk about potential GAC Communiqué considerations as we enter communiqué discussions on this issue.

There's a lot of background and it can be quite complicated. If folks have any questions, please address one of the topic leads offline, and we're happy to provide any additional background that you might have. So with that, I will pass it over to our GAC colleague

Gabe, who leads a lot of this work in the PSWG. So Gabe, over to you.

NICOLAS CABALLERO   And by the way, thank you so much, Gabe. I know it's 3 a.m. in LA, right? Please correct me if I am wrong, so we greatly appreciate you taking the time to do this. Thank you so much, over to you Gabe.

GABRIEL ANDREWS   Well, thank you, Nico. And thank you, everyone. I hope you can hear me well. Let's go ahead and move to the next slide here. I want to inform you all that this portion of the presentation of the session is going to cover material that you've probably seen in several places already. Material from the prep week session that ICANN staff provided to you on the RDRS metrics from the GNSO session with the GAC.

NICOLAS CABALLERO   Gabe, can you turn up your volume a little bit, please?

GABRIEL ANDREWS   I can try to hold the microphone closer to my mouth if this helps.

NICOLAS CABALLERO   Okay, that's better, thank you.

GABRIEL ANDREWS

We'll just do that. Okay, and this will involve material from the GNSO session with the GAC, in which the RDRS Standing Committee Chair, Sebastien Ducos, gave updates, and it will also involve information from the GAC session with the Board. And so if you've been paying very close attention to all of that, this isn't going to cover anything new, but the hope here is to recap all of these new developments and provide some context, especially hoping this will help some of the newer members of the GAC.

So addressing this slide in particular, this is material that we took from the ICANN Org prep week session, and we wanted to highlight that even before the launch of the RDRS in November of 2023, a great deal of community work went into the original policy recommendations for what was called the Standardized System for Access and Disclosure, SSAD for short.

That led to ICANN's operational design assessment of that system, in which they attempted to put a price tag to it based off of several assumptions. And depending on what those assumptions were, the price tag varied quite a bit. This included, stand by one second, this price tag included the cost of authenticating the SSAD requesters that were using it, and that was one of the key drivers of the estimated costs, and we'll come back to that.

From there, there was the proposal to do sort of a SSAD lite, which was called alternatively the WHOIS Disclosure System before being rebranded as the RDRS itself. And this was a pilot project that was intended to collect data about the potential users of an SSAD, as

well as to collect data about the nature of the request and so forth, so as to inform the original SSAD policy recommendations which were put on hold. So, all this is to say a great deal of work went into this even before its launch in November of 2023, almost exactly two years ago. Next slide, please.

And so, the GAC has provided both considerable support as well as considerable feedback to the RDRS during its pilot period. Feedback that, as we'll see in a moment, is largely echoed by the Board's own comments on issues such as enabling the RDRS to function where affiliated privacy and proxy services are in place, or to enable the voluntary participation of ccTLD operators or to achieve the full participation of all registrars. Next slide.

Turning back to some of the data that was presented by ICANN. Org in the prep week, we saw that the feedback the GAC has provided has largely been driven by this data. And so, one of the recommendations that we've came back to repeatedly was the recommendation for, perhaps recommendation is a wrong word. The position the GAC has held is that there should be full registrar participation. We see that over the course of the RDRS pilot, there was approximately between 60 and 90 registrars participating at any given time, and that covered around 50% of the total domains under management of the gTLD space. Let's go to the next slide, please.

And this, again, is from, I think, Sebastien's portion of prep week discussions, we see also that when requests were made, and this

graphic, if you haven't seen it before, is sort of attempting to show the flow of requests from start to finish over the course of the RDRS's pilot period. For every time that the RDRS was capable of accepting a domain and passing it to the appropriate data holder, there was about a one-to-one ratio with the number of times a requester would put a domain, and it would be associated with a registrar that wasn't supported. So, about half and half. And so, one of our data-driven recommendations here is that if you did have full registrar participation, obviously, you would see about a double increase in the usefulness of the RDRS.

Similarly, if you see the domains not supported section above, that includes a lot of different TLDs that just weren't supported by the RDRS to include ccTLDs. And so, while nothing about ICANN policy can dictate to the ccTLD operators what they have to do, some have indicated that they would be interested in participating voluntarily if it were an option, and we feel that that would address some of these 16,000 or so requests that otherwise weren't capable of being routed. Don't know exactly how many, but we feel it's worthwhile to explore.

Lastly, when we look at the requests that were made and we see that approximately 900 were approved, we see that about a third as many, around 300, were marked data publicly available, which often indicates that the registrar is pointing to a proxy service of their own control, usually, rather than the underlying data of that proxy customer. Now, this used to be more common, but some of the larger participating registrars, hopefully, changed a position in

which they began to provide that data about the underlying customer midway through. And so, that ratio's improved over time, and we have voiced our view that all affiliated proxy services should do the same. Next slide.

Here now, we're turning our attention to the RDRS Standing Committee and the recommendations that came out of its final report. This is a committee that both myself and my counterpart, Owen Fletcher, have both been involved in. It's been chaired by, again, Sebastien Ducos, who I feel did a very good job chairing the committee and its work, and I thank him for that. The recommendations came out to include these six main themes of continuing the RDRS beyond the pilot period, we'll return to that, to allow for the authentication of requester groups, beginning with law enforcement.

This is a GAC position as well. To implement key system enhancements to sustain and evolve the RDRS. I heard, even as recently as yesterday, in the GAC-Board discussion, the European Commission echoed the same theme, so it's in the recommendations of the final report as well. To consider further policy work on the privacy and proxy issues, which we just spoke about, as well as the potential inclusion of links to the RDRS within existing systems, such as the WHOIS/RDAP responses.

This is an awareness issue. If it doesn't make sense, the whole point is that when someone first does a query for a domain in the existing tools that have existed for decades, at the very same moment they

learn that the data is redacted for privacy, they also could see in that same return the and so you should now go to this place called the RDRS that you can now request that data if you have lawful need and it will route that request for you. So it would really help for awareness and if that was included in the very same time that the requester first learns that the data is redacted in the first place.

The fifth recommendation would be that the ICANN Board reject the original package of the recommendations in order for them to be amended. We felt in the GAC, we'll come back to this, but we felt that that had to be done carefully. We didn't want that to be interpreted as throw everything away, but rather we recognize that somehow, some way, the original recommendations would have to be amended. So understood where that was coming from. And finally, to maintain the current standing committee with a narrow scope. The expectation is that there might be more work to do and we wanted to preserve the helpful expertise of those who had participated thus far. Next slide, please.

So the GAC's comments on this standing committee report reflected some of the original views that we've expressed before and were largely supportive as the general theme. We agreed that there should be mandatory participation of all registrars. That's been a consistent point from us for some time. We supported the RDRS recommendation for the law enforcement authentication as well as support ICANN staff working on the same with us. We pushed for the continued iterative enhancements of the RDRS. We had, as I just expressed, nuance in our support for the rejection of

the original SSAD recommendations so that they could be modified, but not thrown away.

And lastly, we supported the Board's articulated RDRS goals, which we're going to turn to on this next slide now and which largely mirrored our own. So next, if you would. Here we are. Yes, okay, I think I might have missed that transition. So apologies, but this is the correct slide. For most of the year, the last year, in fact, there has been strong alignment in between the Board's views and the GAC views that we have shared. And one of the key pieces of overlap here is our shared belief that the RDRS is a useful tool and that it should continue to be up and running to operate. We have the shared view of that full registrar participation requirement.

We have the shared view that the RDRS should be useful when affiliated privacy and proxy services are in place. And the Board, again, as recently as yesterday, articulated its view that when an affiliated proxy is in place, the system should return information about the customer of that proxy service. We have the shared view that the development of authentication mechanisms, where appropriate, would be useful to do. I'm seeing a note to speak slower. I'll try to. And we have the shared view to allow for the voluntary participation of ccTLD operators.

I want to note, in particular, the authentication mechanisms for law enforcement is a piece of work that the PSWG is assisting with now. And if we're able to assist with that, we are addressing one of those key cost drivers that was driving the high-cost estimates of the

asset originally. And so, we hope that this work will be very helpful to the community for that reason. Next slide.

And this will be the final slide here. With all of that background in place, what comes next? The RDRS Standing Committee has received public comments recently that will be incorporated into its final report. We anticipate minimal changes to that RDRS report, simply because most of the public comments received seemed to be in line with positions already taken by the committee members.

During the ICANN Board GAC session, it was discussed that on Thursday of this week, there's expected to be a vote to extend the RDRS for two more years while policy work continues with the GNSO. So, we want to watch that very carefully. We anticipate that that's going to be accepted. And then on Friday, we've heard from the Board there will be a new document from ICANN Org that was originally being called a gap analysis document.

Becky has since suggested it might be called an alignment report or similar. The notion here is the Board's goals, as they've articulated, which largely match our goals, they wanted to know from ICANN Org which of those could be supported using existing policy. And that is going to be a very important question to answer. So, we look forward to reading this report when it comes out, potentially Friday. It will be very important to understand and to use.

Finally, we expect after that report comes out and there's been time for the community to provide its own public comment on it,

the Board will work with the GNSO to sort of take all of these pieces and figure out what the path forward is from there. And so, we expect that this will be a very interesting conversation to go from here. And this report from ICANN org expected Friday is going to tell us how much policy is potentially going to be needed or where we can use existing policy to enable these goals to come to fruition.

Thank you, translators. Apologies for speaking too quickly earlier. I appreciate it. And I will hand over the presentation with the next slide to the next speaker.

NICOLAS CABALLERO   Thank you so much for that, Gabe. Let me see if we have questions from the floor or online. And I have the European Commission. Please go ahead.

GEMMA CAROLILLO   Thank you very much. Nico, apologies, I could not raise the hand in the Zoom room. It's been disconnected. And thanks so much, Gabriel, for the presentation and for following the work of the standing committee for the GAC. This is really extremely useful. I have a question, not knowing whether you, Gabriel, or others have an answer.

Because yesterday in the meeting with ICANN Board, we heard useful things in terms of overall alignment of objectives. But it was my understanding that the SSAD recommendations would not be rejected but considered for supplemented action, something

which was not entirely clear to me. But it was raised in the meeting with the Board and from the Board itself. So I was wondering whether anyone had intelligence or better understanding.

GABRIEL ANDREWS   Not being able to communicate with the speakers on the stage, I'll just say I don't have any better insight into the Board's thoughts on that. But if others on the stage may, I invite them to. I note that the prior comment I made about potential reduction of those was only coming from the standing committee itself. It was made absent the Board input at that time.

And so if there's a different way of supplementing those recommendations that doesn't involve rejection, this is a new development and I think does not necessarily conflict with the standing committee's recommendation as I understood it. Because again, as I understood it, it was simply to enable the actions that were suggested. But we shall perhaps get better input from others.

NICOLAS CABALLERO   Thank you very much, Gabe. I have Germany and then India. Please try to keep it short and sweet again for the sake of time because we have a lot to cover. Please go ahead.

RUDY NOLDE   Thank you. Rudy Nolde, Germany. It's more of a comment maybe rather than a question. I think we're in this weird situation that I

think any reasonable person would see the great potential that such a system would have in theory. But when we see the usage data and the performance, the RDRS is not working the way that we would want to see it for a number of reasons that we have discussed numerous times. But I think it's very important that we continue to signal that the current performance does not mean that there's no sufficient demand for the RDRS, but it is due to the shortcomings of the system right now and we should improve it.

And I've just heard that some registrars are of the opinion that we have our own system that works much better. I've heard that they say that the requests received via their own system are of much better quality for them than the requests received via the RDRS. And they say we may not need the RDRS, we have our own system. And I would appreciate that those maybe see this as a collaborative effort to bring their best practices to the table and improve the RDRS. Thank you.

GABRIEL ANDREWS   And if I may respond very briefly.

RUDY NOLDE   Go ahead.

GABRIEL ANDREWS   Good comments. I note that one of the recommendations that's come out is to, and this is a Board view and a GAC view, is to enable API access for both registrars and requesters. Theoretically, this

would enable better capability for the RDRS to triage requests to existing registrar systems, which hopefully would address some of those registrar concerns. But ultimately, there being 2,000 to 3,000 registrars in the world, even if some of those registrars have the very best intake systems, I think it's somewhat challenging for requesters to maintain awareness of all of them. And having a unified intake portal, of course, has a great deal of potential utility for that reason alone. Over.

NICOLAS CABALLERO   Thank you so much, Gabe. I would add, apart from API access, it would be good to have access to the source code, as a matter of fact. But anyways, I'll just leave it there. I have India next.

SUSHIL PAL   Thank you, Gabriel, for such a comprehensive presentation. First of all, responding to your, I think, the 2,000 and 3,000 registrars, and as I understand, there'll be a single API which the RDRS will design. And so there would not be a need for 2,000 or 3,000 different registrars making separate APIs. I think they'll all be only consuming, right?

But the question I have, what I see is that the community inputs on the gap analysis alignment report, do we have a separate report, something called gap analysis report? Because all of it, so far, I thought that the standing committee's report was itself a gap

analysis report on the existing RDRS and what can be done to improve it. Are we talking about a new report?

GABRIEL ANDREWS

Yes, and this is a very key question, so I'm glad you asked to clarify. There was work in the RDRS standing committee to do some of that analysis, but we've learned very recently that the Board had asked ICANN Org to do an analysis as well for their stated goals, which I think we've covered already, and they've covered with you directly yesterday. They asked for their goals, whether existing policy would enable them to be accomplished or whether a new policy would be needed, and that separate report we expect will come out this Friday. So this is news to us. We weren't necessarily aware of that in the standing committee earlier, but we're made aware of that now. I think it was last week that Becky came in and briefed the standing committee on this, if my memory is correct.

So we should be aware this is separate, hopefully useful, but it's coming about this Friday, so as we're leaving ICANN84, and we will very much want to review it and be ready to offer GAC comment on this new report that I believe is accepting public comment through December of this year, but we don't know the exact close date yet. Over.

NICOLAS CABALLERO

Thank you very much, Gabe. So we need to move on. Thank you so much, and we really appreciate again, Gabe, the fact that you're

taking the time for this presentation at 3 a.m. in the morning, California time. Thank you very much.

So moving on, our next agenda topic is Privacy, an update on our privacy and proxy services discussions, and for that I will hand the floor to Owen Fletcher from the USA. Owen?

OWEN FLETCHER

Thank you. Hi. Trying to get the volume right. Okay, this is Owen Fletcher. I'm the alternate GAC representative for the United States. This will be a very short update on privacy and proxy services. You can consider it an interim update because there will be, I think, times in the future when there is a more active decision to be made about what's next on these issues.

So Gabriel and I are both on the PPSAI working group. This is a working group that is reviewing essentially whether the previously adopted recommendations from 2016 related to privacy and proxy service accreditation can still be implemented in whole or in part. You can read the bullets if you'd like, but I think what I would like to highlight in particular is that the work of the IRT for PPSAI has recently sent questions to the GNSO Council to request input that will help the IRT then continue to do its job.

So the GNSO small team proposed responses to the IRT's questions. I think the GNSO Council will discuss those proposed responses during ICANN84, and then we're expecting the PPSAI IRT will continue meeting and working toward ultimate conclusions.

Meanwhile, I would flag that as Gabriel and the Board have also discussed this week, both the GAC and the Board have noted interest in the RDRS facilitating requests for privacy and proxy service registration information. So that's a separate sort of track of work from the IRT, but another way in which it's an active issue for the GAC right now. So stand by for more updates, hopefully at the next ICANN on privacy and proxy services. Thanks.

NICOLAS CABALLERO

Thank you so much, USA. Let me stop here for a moment in order to see if we have any kind of feedback from anybody in the room or online. I don't see any hand up so far. I have no hands online.

Okay, thank you so much, Owen. So moving on, our next topic is urgent requests for disclosure of registration data, and for that I will give the floor to my distinguished colleague from Canada, David.

DAVID BEDARD

Thank you, Chair. Hi, everybody. Hi again. So my name's David Bedard and I'm the GAC representative from Canada. So I'll be providing an update on the urgent request work, along with my colleague, Gabe, who you heard from earlier, who leads some of this work in the PSWG.

So just for a little bit of background, our work here on urgent requests comes out of an expedited policy development process team recommendation, recommendation number 18, which is on the screen here, which has stipulated that a separate timeline will

be considered for the response to urgent reasonable disclosure requests, those requests for which evidence is supplied to show an immediate need for disclosure.

So I think it's important to highlight here and to keep in mind that when we talk about urgent requests for disclosure of registration data, it's only in very particular and limited instances or circumstances, so whether there's an imminent threat to life, serious bodily injury, critical infrastructure and child exploitation. So at the time of the agreement on the timeline to respond to urgent requests was not able to be reached within the recommendations. So next slide, please.

So this slide gives us an overview of the back and forth between the GAC and the Board and the various instances the GAC has stressed the importance of coming to ground on a timeline for urgent requests. As I mentioned at the top of the hour, this has been a perennial issue in the GAC, one of the perennial issues in the GAC, so it's been ongoing for quite a while. I'll just highlight here that notably the GAC issued advice on this in the San Juan communique, where it advised the Board to act expeditiously to establish a clear process and timeline for delivery of a policy on urgent requests.

So following the GAC's text in the communique, the Board wrote to the GNSO Council on this matter, and notably the Board agreed that to respond to imminent threat, a much shorter timeline, so we're talking minutes or hours and not days was probably needed.

So I think it's important that we just highlight some of that alignment that happened coming out of that discussion. So next slide, please.

So following this, the GNSO Council agreed with the Board's assessment and proposed a meeting between it, the Board, and interested GAC members and PSWG representatives to discuss an effective way forward. So coming out of that meeting, what I want to highlight here was that it was decided that work on urgent requests would consist of two work tracks.

So the first would be a technical track to be led by the PSWG, and that would explore mechanisms to authenticate law enforcement. And then also a policy track, which would commence work in parallel, and that would determine an appropriate time to respond to a verified urgent request for data disclosure. With respect to the technical track, that's basically to build a mechanism to verify urgent requests are coming from a verified law enforcement agency.

So work on the technical track had been underway since ICANN82. So as I mentioned, we have those two tracks. I'm just going to hand it over to Gabe, who's leading on the work on that technical track, just to provide folks in the room an update on that, and then we'll kick it back over to me to provide the policy track update. Over to you, Gabe.

GABRIEL ANDREWS

All right, thank you, David. So the update, we have been exploring with PSWG what we're calling long-term and short-term mechanisms that exist as options. The long-term mechanism that we're exploring is really the robust authentication path forward. It is the exploration of existing or aspirational law enforcement portals that can serve as identity providers that would enable that identity authentication to be passed to ICANN. And we're talking about, when we say passed ICANN right now, connecting to the RDRS system that ICANN operates.

These law enforcement portals offer services to law enforcement. The notion is RDRS would be one of those potential services. If you're involved in this space technically, that would mean that ICANN would be the service provider, the law enforcement portals are the identity providers. The work so far has proceeded to the point where we have agreed upon the expected protocol that we'll use. There are various technical protocols out there.

We're also in agreement on the data elements. These are largely dictated by the data that's already collected by the portals that exist. So these are things like the employer agency or the country name and so forth. And these are important things to standardize to ensure that when we're passing data from different sources to include Interpol as they're creating their own system or the US as we use our law enforcement enterprise portal, that we're providing data in a standardized format.

So we're well on track with conversations towards that. These conversations have involved ICANN or technical staff as well to make sure that we're all ready to talk the same language. We're anticipating that dev work will begin in the first half of 2026. For some of us, that might be as soon as January, but that's the timeline that we have in mind. It's taken some time, I will confess, just to align resources within our various law enforcement agencies.

But I do want to say that I have received a very strong support from our colleagues in Interpol, which I'm very grateful for, and also received very good communication and feedback from ICANN or technical staff, grateful for that as well.

We should have much more to say on this issue once development begins in the first half of next year. So expect many more updates to come on that. I will note also, however, that some of the ideas that came out of discussions with our Europol partners have led us to creating a short-term mechanism as well that is not as robust, but still potentially helpful. And this is simply that we have lists of law enforcement agencies that are members of the parent agencies.

So for Interpol, they have approximately 190 member nations. For Europol, they have approximately three dozen member nations and law enforcement agencies for those nations. For the U.S., we have thousands of state, local, federal, tribal agencies that we're aware of.

There's also, if you select GAC members, that might not fall within those categories, but are still aware of their own law enforcement. And so from each of those, we were obtaining lists of those agencies and certain identifiers, and providing those lists to ICANN org, so that if someone were to make a RDRS request and their information matches those known identifiers, and if they select the law enforcement category, that this might be provided to the data holders as an additional data point.

So that also has been worked on, and at this point, ICANN is in possession of a large number of those lists, and they are in the process of conducting a review to determine how they might house and share that data with the registrars. I know the registrars have suggested in particular that their name services portal might be a helpful place to store that, and this is being explored.

And that's it for the update here, but if there are additional questions, I can probably speak in more detail directly. Thank you kindly.

NICOLAS CABALLERO

Thank you so much, Gabe. I have a very short technical question. When you say standards, are you talking about formats? And in that regard, are we talking about CSV, PDF, ODF, and those sort of things?

GABRIEL ANDREWS

So for the long-term solution, we're talking about OAuth protocol, and then which data elements would be passed along with that and so forth. It's not strictly FOSS, as I've heard you're a strong supporter of, but it's open, I think, in principle, and so easy enough to employ, I believe, by ICANN and by the law enforcement agencies. I am not a engineer, but I just hear them talk back and forth.

DAVID BEDARD

Thanks, Gabe. Thanks for that update. So moving on, I will provide an update on the next slide, on some of the policy work that we've been doing along that policy track that I had mentioned before. I will try to slow down, as I have a tendency to speak a bit quickly.

So in terms of the IRT meetings we've had on this issue, members of the GAC small team have participated in, I think, a total of six sessions with ICANN org and the contracted parties to try to come to ground on a policy update on the response time for urgent requests from verified law enforcement. So it's important to note that conversations we've had have been under the assumption that a policy would become applicable once an authentication mechanism would be in place, so one is dependent on the other.

So here we have some changes that you can see on the slide that the group has been able to reach on a compromise basis. So here we have 3.8, which is urgent requests for lawful disclosure, and this would be an update to the registration data policy language. So urgent requests are a subset of disclosure requests submitted by

an authenticated requester that are limited in circumstances, like I said, that pose an imminent threat to life of serious bodily injury to critical infrastructure or of child exploitation in cases where disclosure of the data is necessary in combating or addressing this threat. So this really defines the narrow scope that I was referring to before.

And then importantly, in 3.9, here we have the authenticated requester definition, which means that a law enforcement requester or trusted competent authority that is authenticated through an authentication mechanism implemented pursuant to ICANN consensus policy. Next slide, please.

So here we have additional changes that are proposed in the text. Here we have 10.7.11, which is a disclosure request is an urgent request if it is submitted by an authenticated requester, and such entity attests that the request pertains to circumstances defined in that previous section.

And then here, really, we're sort of getting at the meat of it in terms of the requirements that would be placed on contracted parties to respond to an authenticated request for urgent disclosure. So that would be within two hours of receiving the request. They would have to issue a, not necessarily a determination of the request, but at least a response to the request. And then a subsequent change would be to respond to the urgent request without undue delay, not to exceed 24 hours absent exceptional circumstances. That will be defined in 10.7.23, which we'll get to on the next slide, please.

So this is an important change and outlines in very limited cases in which contracted parties could be granted an extension in the timeline to respond to an authenticated urgent request. So I just want to stress here that the GAC's position is that the 24-hour timeline be the default response timelines to all urgent requests from verified law enforcement.

However, after careful conversations within the IRT with contracted parties, it became clear that we would not reach consensus on the 24-hour requirement unless we agreed on an extension clause should be in these exceptional circumstances could be applied that would prevent a registry or registrar to comply with the requirement.

So this was the proposed GAC language that we proposed as a compromised way forward. And you can see it on the screen here. I won't read it in full, but I think it's important to look at the bolded text. So the timeframe within which a registrar or registry operator expects to respond, which cannot exceed 72 hours from receipt of the request. So this is in those exceptional circumstances in which they would not be able to respond within the 24-hour timeframe. And those are largely unforeseen and uncontrollable events or force majeure. Next slide, please.

So where are we now? So the policy changes discussed in the IRT are currently out for public comment with a due date of December 15th. So ICANN org is seeking comment on three themes, which are here. So it's on the clarity of the policy language. So whether it's

clear policy alignment with the GNSO policy recommendation, specifically recommendation coming out of the EPDP Phase 1, recommendation number 18.

And the last one is a question on whether the inclusion of authentication mechanism necessitates new GNSO policy development. So remember that 24-hour response requirement is contingent on the existence of the authentication mechanism, which is an outstanding question as well. Next slide, please.

So as we are in the comment period for the GAC small group, we'll prepare a GAC comment and will be circulated to the wider GAC for consult. As we are thinking about what should be integrated into our comment, there are a couple of GAC considerations. So namely, we note that there is still some reservation towards the proposed 24-hour timeline. So we will see what the contracted parties and others raise in relation to this during the comment period.

And then there's also the question of whether additional policy work is needed. We did hear from the Board yesterday, and we were encouraged by the Board yesterday and their message and that the GAC's bilateral with them, that there are potentially going to revisit recommendation 18 to determine whether a new policy process would be needed. So there could be alignment there, so we'll be tracking those discussions as well. But certainly, it's something that we're considering and it's something that the GAC is aware of, particularly because any new policy development

process on the mechanism will necessarily delay the implementation of the policy. Next slide, please.

And now we are accuracy of registration data. So I think we have time to pause there for questions, but I'll hand it back over to the chair for that before we get to accuracy. Thank you.

NICOLAS CABALLERO   Thank you so very much, Canada. Indeed, let's pause here in order to see if we have questions from the floor or online. I see no hands. There's one hand from the European Commission. Please go ahead.

GEMMA CAROLILLO   Thank you very much, Nico. And thank you, David, for the presentation. I just wanted to note from our side, from the European Commission, we are actively involved together with other GAC members in following this policy implementation. And since this has been on the agenda of the GAC for a number of meetings, we have issued advice at several locations. And so David has already recalled the path. Just to note that satisfaction that progress is being achieved. We are moving forward. We seem to see the end of the process in what is satisfactory fashion. Of course, the process is not concluded. We need to be vigilant until the end.

And also to echo what David was saying that the comments from the ICANN Board as regards possible way to incorporate the authentication system in the implementation. Part of the policy

seemed reassuring as regards not delaying further this process which has been open for more than two years at this stage. Thank you.

NICOLAS CABALLERO

Thank you, European Commission. Next, I have Eswatini and then India.

ANDREAS DLAMINI

Thank you, Chair. Andreas Dlamini from Eswatini. It's two questions, Chair, which probably the answer is there. It's just that perhaps it's me that is not aware. The first question is how do law enforcement get the process for the authentication as to how, if the steps are there, to follow to become an authenticated requester?

And then the second one is, this again, like I said, like I did, I asked yesterday, it's something that touches on the developing world because we, some of our countries don't have resident registrars so that the registrars are far away from us and we don't have easy access to them. What if you do request and they don't respond? What do you do? Thank you.

DAVID BEDARD

No, thanks very much. I think for your, at least for your first question, I'll just hand it over to Gabe to provide a bit of an update on that.

GABRIEL ANDREWS

Yeah, that's fine. Thank you, David. So first off, I think you are correct. It is important to recognize that the developing world will not have the same resources as some of the richer nations of the world and this is something that it just has to be confronted. What we've attempted to do is to identify the existing or aspirational resources that we could divert towards this use case, rather than trying to create something out of whole cloth that would end up being very expensive as the original asset contemplated.

What we've learned from our counterparts at Interpol is that they have aspirations to create a portal that would provide resources to all of their member nations. I note that they cover most nations. I also note that they are, I should be careful how much I speak on their behalf here. They are aware of resource challenges amongst some of their members as well, but they're attempting to create tools and resources that will benefit them to the greatest degree that they can. We'll perhaps be able to speak more towards this as this portal becomes more real, but this is work that is actively being worked toward with the goal of incorporating as many of their members as possible.

So there are challenges as you identified, there's recognition of those challenges and a desire to overcome them, but I cannot promise that we will ever be 100% effective. I think it would be a fool's errand to assume that we could reach 100% of law enforcement across the world, because there's a lot. What we can do, however, is get the majority of law enforcement into position

where they can authenticate themselves and that itself would be a fair site better than what we have today. Over.

NICOLAS CABALLERO   Thank you so much, Gabe. I would add and thus my insistence on using open source software so that you could, not in terms of cost or in financial terms, which would be a burden, by the way, because charging for the same software, 175 countries for the same software would be an issue. But putting that aside, the importance of having access to the source code and to modify that source code, however your government or your law enforcement agency might want to do or implement or modify is a very important component, I guess. India, please go ahead.

SUSHIL PAL   Thank you, Nico. Just clarifying, I mean, we understood all along that for the urgent request authentication was a part of the recommendation 18 and there should not be a separate PDP. And it really amuses me as to what is the policy there that we need a PDP in. I mean, if there is an urgent request it has to come from authenticated agency. It is only the enablement of the technical platform.

I mean, there are loads and hundreds of digital signature mechanisms and all those platforms which actually verifies. So I'm actually at loss to imagine what is the policy work there that would need a PDP and if that be the case, then actual implementation of

this recommendation get pushed up by another two years. So that's all.

DAVID BEDARD

Thanks. I think that this is very much a live discussion. I think there's some uncertainty on whether the policy process will be needed, which was highlighted in the comment and it's certainly something that they're seeking clarity on. So as we heard in the Board bilateral with the GAC yesterday, it does sound like they are open to the possibility that it wouldn't necessarily require a separate policy development process for the authentication mechanism. So I do take your concerns, but it's certainly something that we do unfortunately need to wait to see if it would in fact be needed.

NICOLAS CABALLERO

Thank you, India. Thank you, Canada. At this point, Eswatini, very short and to the point, please, I'll give you the floor.

ANDREAS DLAMINI

It's just that I didn't hear the second part of my question. I didn't get the response to the second part of my question.

DAVID BEDARD

Yeah, thanks so much. I think that the second part of your question is very much a compliance question if the registrar doesn't respond. So it is required to respond, though the response could

be a denial. So if they don't, it really is a matter to raise with ICANN compliance on whether or not they are compliant with what they're required to do under their contracts with ICANN. But I think it is very much a compliance issue.

NICOLAS CABALLERO   Gabe, I see your hand up. Please go ahead.

GABRIEL ANDREWS   Thank you, Nico. I just wanted to correct something that I could have articulated better. When I was speaking to the development work that we're anticipating to begin in the first half of 2026, I'm in particular speaking to the work of the law enforcement, both within the United States, as well as our Interpol partners.

We very much appreciate the support and ongoing communication from ICANN org, but I did not mean to indicate that they've committed to this, as I know that they also have, well, they have limited development resources that are also going to be tasked with things such as the next round of gTLD applications. So there's a balancing act that I believe that they will have to be conducting. But I wanted to make clear, I was speaking only on behalf of the law enforcement. So thank you for allowing me to rectify that statement.

NICOLAS CABALLERO   Thank you, Gabe. Well noted. So at this point, we need to move ahead. The topic is accuracy of registration data. And for that, I'll

give the floor to, is it Tara, Jeff? I'm sorry, sorry, Owen, Owen. Yeah, yeah, go ahead. Please, the floor is yours.

OWEN FLETCHER

Thank you. This is Owen Fletcher again. Could I get the next slide, please? So for registration data accuracy, I will quickly give you some background to help everyone be up to speed. And then we have a panel discussion with the speakers on my left, who I will also introduce in a moment.

This is a sampling of recent GAC comments related to the importance of registration data accuracy. It has been mentioned in many communiques for at least all the years that I've checked. And I could read some of them out loud, but I suppose I'd like to draw attention to repeated concerns the GAC has raised with stalled work on accuracy at ICANN since there was an entity called the Accuracy Scoping Team that was paused since 2022.

Now, recently, there are more updates on that. The GNSO had a small team on accuracy that has developed some updated recommendations. Paul McGrady, one of our speakers, already spoke a little bit about this in our bilateral meeting with the GNSO. And he will again in a few minutes. I also wanted to note that at the last ICANN, ICANN83, the GAC noted its interest in addressing the current 15-day timeline for registrars to perform validation of registrant contact information.

Also, early this year, the GAC provided input on GNSO questions issued to the community about registration data accuracy. This was to inform the work of the GNSO small team. And one thing that the GAC mentioned in its input was accuracy is important for purposes such as law enforcement when it needs to perform subject attribution or victim notification, meaning it's useful for law enforcement to obtain information about a domain name registrant in those situations. Could I have the next slide, please?

So the top bullet on this slide about further updates is about Accuracy Scoping Team. I'll invite Paul to say more about that later. And also I've listed here in the second set of bullets the recommendations from the small team, which I'll also set aside for Paul to cover. I wanted to note that if you missed it, ICANN Compliance provided a webinar before ICANN84 for the GAC, so that interested GAC members could get a better understanding of what's actually required currently and how ICANN enforces accuracy-related requirements in its contracts.

So here are a few items I would note from the webinar by compliance. Registrars have 15 days to validate the email or phone number of a registrant to ensure contactability. Registrars also must include something in their registration agreement that requires registrants to provide accurate contact information, and they must make commercially reasonable efforts to enforce that agreement. Compliance also audits registrars usually each year, and those audits include accuracy-related questions, and you can

look at the findings from past audits on the ICANN website. Let's go to the next slide, please.

And I will invite our panelists to start speaking. So each person on this panel is coming, I think, from an interesting and different perspective, and it will be helpful for the GAC to learn information from all these different perspectives when we're considering what should be done next. So we're going to start with Jeff Bedser from the Security and Stability Advisory Committee, and I think you have slides. Can we pull up Jeff's slides?

Meanwhile, our other speakers are Paul McGrady, who is from the GNSO and led the GNSO Council's Small Team on Accuracy. We also have Sarah Wild from Tucows and the Registrar Stakeholder Group, and Dr. Devesh, whose last name is no longer on the screen, but I've got it here, I'm sorry, Devesh Tyagi from NIXI, the operator of .in India's ccTLD. I think we're ready for Jeff. And I'll ask you each to keep your introductory comments to just three minutes, I'll let you stretch it a little bit, but I'll interrupt you if needed. Thanks.

JEFF BEDSER

Thank you, Owen. Jeff Bedser. So I've been asked to give a quick briefing on the SSAC reports that related to DNS registration data accuracy, in specific, SAC058 and SAC129. Next slide, please.

So I will note that there is another SAC work, SAC003, from 2003, which is referred to in SAC058. SAC058 is from 2013. So the point I'm making, of course, is that 2003, that's pretty early ICANN years.

This has been a topic on the agenda about every 10 years for SAC, because SAC129 came out in 2025. SAC058's topic was Domain Name Registration Data Validation Frameworks. SAC129 was SAC's comments on the GNSO Accuracy Concept Proposal of July 2025. Both emphasize accuracy is fundamental to DNS security and stability, and the framework for understanding stakeholder needs and validation approaches. Next slide, please.

So a little more detailed breakdown. SAC058 established a systematic approach to data validation. It identified stakeholders and their specific use cases for registration data. It provided a framework for understanding the accuracy requirements. It was actually referenced extensively by SAC129 as foundational work, and the appendix contains detailed stakeholder analysis and purposes. Both documents are still available at the SSAC wiki on the ICANN website.

SAC129, the core security arguments for data accuracy included usability. Inaccurate data hinders communication and identifications. Security impairs law enforcement anti-abuse efforts and cyber-attack notifications to victims. And operational efficiencies, it can disrupt security analysis, domain transfers, and dispute resolution related to domains. Next slide, please.

So the recommendations that came out of these documents were primarily in these five bullets. Defining accuracy. What constitutes accuracy under the various regulations. Achieving accuracy. How to ensure sufficient data accuracy levels for the required need.

Measuring benefits. Quantifying the benefits to justify the commercial burdens. NIS2 compliance. EU directive implications for registrars and registries. And lastly, assessment methodologies. How to measure accuracy and compliance. I will note that since, of course, SAC003 is 2003 and 058 was 2013, technology has advanced significantly in the arenas of the data points used for contacting entities.

I will note, of course, that everyone has experienced that the proliferation of VoIP phone numbers means anyone in the world can almost get a phone number that appears to be from anywhere else in the world. So the ability to have an accurate phone number that does ring through to an entity does not necessarily mean it's accurate to the person it alleges to be. Much like email has always been.

And secondarily, I also point out, I believe in a previous GAC session within the last couple of ICANN meetings, that AI's usage for very convincing government document forgeries has been noted by a lot of parties as a problem with validation of those details as well. So I believe that's all I have for that quick summary, Owen. I'll turn it back over to you.

OWEN FLETCHER   Thank you, Jeff. All right. Paul, could I invite you to go next?

PAUL MCGRADY

Thank you. Paul McGrady here. In my role as GNSO counselor, I'm appointed by the NomCom to represent the Non-Contracted Parties House. And so I'll do my best to not go off the rails from what my other counselors would like for me to say. I have a lot of personal opinions. I'm going to try really hard not to share them.

But just as a preliminary note, I want to just point out that this issue is alive and well in the GNSO. And in fact, there is a session tomorrow at 16:30 in the afternoon on this topic called accuracy. Can we have anonymity and a secure internet? By the way, they say if you speak a language other than English, you should let them know. But I speak Tennessee, and I don't know how to say anonymity. It's a big word. But I realize that that session is during one of your communique drafting sessions. So it may be difficult to get there. But I thought it was worthy of a mention in case folks could get there.

Can we have the, if you don't mind, there was a really succinct slide about the GNSO accuracy small team recommendations. I'd like to quickly, if we can, put that back up and just use that to walk through. As it notes here, there were four things that came out of that. And I'd like to focus on item four, if I can. But I'll start with the other three, because they're certainly worth mentioning.

Thing one is that we should examine the 15-day timeline for contact information validation. And as I mentioned when I was with you earlier in the week, that issue is being referred to the DNS abuse small team to be looked at to see if it can go into the DNS

abuse pipeline. Right now, the Council is considering either one two-issue PDP or two one-issue PDPs to look at a couple of DNS abuse topics. But there will be, I understand, more topics coming in behind that. And this is one that's being looked at.

I think later in this session, we'll be talking about what we heard from India, from the European Union, and from the United States that, hey, how about the idea of zero days, right? And so we'll talk more about that later. But that issue relates to bullet point number one. Bullet point number two is make educational materials accessible to encourage registrants to provide accurate information and explain how their data is safe.

As I mentioned earlier in the earlier session, that is underway. And also taking a look at the issue that's been around for a while. How do we implement? Essentially that came out of the reviews? How do we implement showing that a domain name is suspended for inaccurate data so that registrants know what's happening with their domain names?

The last bullet, though, is close the accuracy scoping team. And I'm afraid that that is not as fulsome a bullet as I would like, because it might give the misimpression that the Council thinks that their work is done, because they have shut down the accuracy scoping team. There is sort of a comma and an additional phrase that's missing there.

So let me read to you from the rationale what we mean. Towards the end of the rationale, it is important to note that proceeding with

the small team's recommendations to close down the accuracy small team scoping does not foreclose additional scoping work on this topic, accuracy, in the future. However, the small team does not recommend proceeding with another scoping team at this time. And this is the important part. Instead, the small team recommends further scoping efforts be assigned by the GNSO Council to this small team or its successor.

In other words, we're moving because accuracy is really important. And the scoping team had sort of ground itself to a slow halt. The work is being brought in-house to the Council so that it can be considered by a Council small team and move through the process much faster. So I just don't want anybody to lose heart because of that last bullet point. It's the opposite of there not being a mechanism to talk about accuracy in the Council and to move the ideas and the issues along. It's the opposite of that. We are doing this to move things, to give them better attention, to move them more quickly. And so it will rest inside the Council.

So moving forward, as you have your discussions with the GNSO Council, you're talking to the right folks. So I hope that was three minutes or less. Thanks.

OWEN FLETCHER   That was great. Thank you. All right. Over to Sarah.

SARAH WYLD	Hi, this is Sarah Wyld. I'm the vice chair for policy of the Registrar Stakeholder Group. I work at Tucows in Toronto, Canada. And I'm here to talk about registration data accuracy from that registrar's perspective. Thank you for having my slides up. Let's go to the first slide, please. The next first slide. Thank you.

So this is what I'll go through in my few minutes. We'll start with an overview. What does it mean for registration data to be accurate? Then we'll look at the obligations that registrars have in place already and the contract and policy requirements both. And finally, we'll look at how it comes into real life. Next slide, please. And again. Thank you. Again, next, please. I guess I could have not done section titles.

So accurate registration data allows the registrar to contact the registrant, the domain owner with important information about their account. We can tell them they have a domain name. Here's the data that's on it. We can contact them if there's a problem, if it's time to renew the domain. Accurate registration data identifies the registrant sufficiently to enter into the contract, the registration agreement.   That is what is essential to us is to have that contractual relationship. Next slide, please. And probably two more. Can we go to the next bit, please? Super.

So there are two aspects to registration data accuracy that we consider. First, we have validation. Validation means ensuring that all the required data is provided and that it's in an appropriate format. An email address has the @ symbol where it belongs,

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characters before and after. A phone number is formatted properly for the region that it belongs to. That is validation. We call that syntactical accuracy.

Then we have verification. This operational accuracy is how we make sure that the registration data actually works. We can contact and interact with the domain owner using the data that they provided. The ICANN policy requires that the registrar contact the domain owner and receive an affirmative response in order to consider that data verified. So again, validation, make sure that the format is correct. Verification, make sure that it actually works. Next slide, please. And again, please.

So there are a lot of slides in this section of the presentation. I will not speak in detail on all of them. My hope and expectation is that the deck will be provided for your reference later on so you can read in more detail if it interests you. Most importantly to my consideration, we have our registrar accreditation agreement.

This is the contract between the registrar and ICANN that allows us to operate and provide gTLDs. And within that contract, there's a requirement that passes through to the domain owner. The domain owner is obligated to provide accurate and reliable contact details to the registrar and if there's a change, they move houses, they get a new email, they must update that information with the registrar within seven days of that change.

If the domain owner provides—Oh, my gosh, this is an outdated slide. I'm so sorry. There's a typo at the beginning of that last

paragraph. It should say inaccurate. I thought I had corrected that. If the domain owner purposely provides inaccurate or unreliable information or they do not update to their new data within a timely change or do not respond to the verification request within the 15-day required period, in those circumstances, the domain must either be suspended or cancelled. So there is an obligation for the domain owner and there is consequences for not meeting that obligation. Next slide, please.

So next up, we have the Registration Data Accuracy Program Specification. This is part of the Registrar Accreditation Agreement and this is where they get into the real details of how the validation and verification requirements work. Again, referring back to that time frame to complete the verification. Let's continue on.

FABIEN BETREMIEUX   And sorry, this is the support team from the back table. We're following your cues, but we're having a little delay in the display of slide between the time we push the button and it shows. So just bear with us.

SARAH WYLD   Thank you for explaining that. I appreciate that. I'll try to speak off of the version that's actually on someone's computer. I could have had it myself. But so then we have the Restored Names Accuracy Program, policy rather. The whole policy is right there. It's little. This is a very targeted and specific policy. It says that if there's a

domain name that was deleted or suspended because the data was wrong or not verified, then it cannot be activated again in the zone. It must be on hold status until the data has been updated. That's already an active policy. Next slide, please. Thank you.

Finally, we'll talk about the, I'm calling it still the WHOIS Data Reminder Policy. I know it's not registration data, but we all call it WHOIS. So this requires every year the domain owner must be presented with their own registration data. They have to be reminded what data they have on file and reminded that they need to update it if it is out of date. Next slide, please.

Okay. So now we're going to get into the reality of it. We'll move one more forward. Thank you. As I said earlier, for syntactical accuracy, the registrar makes sure that all the data is provided and in the required format. And we'll see an example of that in a moment. For operational accuracy, the registrar sends an email or an SMS to the phone number, or I guess they could phone the registrant, and that must receive an affirmative response within 15 days. Otherwise, the domain is suspended, which means it ceases to work. It is removed from the zone file, so it does not resolve until the verification is complete. Next slide, please.

And here we will see an example of how syntactical accuracy works. I went to my own website and tried to register a domain with an invalidly formatted email address and could not do so because the validation must happen before the registration can be processed. Before. Thank you. Next slide, please.

Then we will see an example of operational review. This is a template, not quite the real email, but it's what it looks like in my platform. I'm sorry, I'm presenting on behalf of the Registrar Stakeholder Group, but I had access to the 2CAS platform, so that's where the screenshots come from. So you can see it's an email that goes to the domain owner. You must verify as soon as possible. It provides a link to click, and at that link is a button to say, yes, this is really my data. Next slide, please.

And finally, resources. As one of the outcomes, I think from the WHOIS small team and in discussion with the Registrar Stakeholder Group, ICANN has provided an info sheet on accuracy, reviewing the obligations of registrars, registries, and domain owners. So that's well worth taking a look at. There's also a web page that accompanies it, and the registrar stakeholder group has provided guidance and information on many topics relating to registration data, which we hope are helpful. That's what I have for you now, and I look forward to the discussion. Thank you.

OWEN FLETCHER   Thank you. Dr. Tyagi.

DEVESH TYAGI   Thank you, Devesh Tyagi, NIXI. The NIXI operates .in ccTLD under the government of India and deeply committed to keeping India domain space secure, trusted, and accountable. And in alignment with the ICANN focus on WHOIS accuracy, NIXI has launched a

comprehensive verification and validation process for all .in registrations since December 2023. I'm happy to share that we have got a very good result out of this initiative that we have taken.

For all the new domain registrations, we had applied this on only the new registrations. We had been verifying the registrant data on address, email, phone number, and name. And we found that when we are doing so, when we started, and for first six months we verified around 1.5 million of the data. And out of that, we found 60,000 odd domains which was not having the accurate data as per our requirement. And we found that it is only the 4% of the total data which is creating untrust in the dot in domain.

So out of this 60,000 domains, when we started in December 2023, we were getting around 8,000 domains per month as accurate data. And once we had implemented this process, it reduced in first six months only to around 3,000 domains per month. So the effect of the verification and validation process which we started was everybody to see.

We had also, due to this, we are able to get a measurable decline in domain abuse. And SURBL ranking, which reflect reduced malicious activity within .in domain, we are able to reduce this significantly. We are also working with the mandatory EKYC policy, and with the current TSP partner, we have made it mandatory that we should be implementing EKYC policy for all the new registered domain which we are getting. So looking ahead, we are advancing AI-driven anomaly detection, cross-verification.

OWEN FLETCHER	Sorry to interrupt. Could you please try to speak slower for the interpreters? Thank you.
DEVESH TYAGI	Sure. So looking forward, NIXI is advancing AI-driven anomaly detection, cross-verification, which is national ID databases, and disk-based registrar audits, alongside multilingual outreach to make .in domain a global model of ccTLD trust and cyber hygiene.

We also acknowledge that ongoing discussions on voluntary participation of ccTLD managers in the RDRS. Such participation, India believes, must remain optional and country-specific, ensuring that this shared data flows only among consenting participants in line with national legal and policy frameworks. India suggests exploring a separate RDRS-like mechanism for ccTLDs, where ICANN could facilitate bilateral or regional MUs defining data sharing preferences. This will definitely strengthen trust, transparency, and lawful cross-border cooperation.

In conclusion, India experience shows that accurate WHOIS data, EKYC verification, and secure data sharing frameworks together can dramatically enhance DNS trust. NIXI remains committed to building a safe, transparent, and globally trusted domain ecosystem for the digital world. Thank you.

OWEN FLETCHER	Thank you so much for that. Nico, so I think because the entire session has run over, we are going to not have Q&A for the panelists. I'm sorry. We need to do a few minutes of communiqué discussion. Would you like to?
NICOLAS CABALLERO	Thank you so much for that. So a big round of applause to our panelists today. Thank you very much. Where, as a matter of fact, we only have five minutes for some considerations for the communiqué. So I'll hand it over to you again for that, David.
DAVID BEDARD	All right. So I think we can just go to GAC members for any comments on issues for communiqué consideration. Of course, the highlights that we've covered are RDRS, urgent requests, and accuracy. And for awareness, the GAC's topic leads on registration data have some draft texts that we can now update on these issues. And we'll be trying to get that ready for the communiqué.
NICOLAS CABALLERO	Thank you so much for that, David. As a matter of fact, and again, for the sake of time, because we only have four more minutes, I would recommend we park this here and we include whatever text we might have for RDRS, and urgent requests, and accuracy for our session at 16:30 p.m. today, if everybody agrees, in order to take advantage. And also to give time to all the delegations to discuss internally, if you agree, of course, unless you want me to do that

right now. But that would be for three minutes, wouldn't make any sense.

So I see nodding in the room. Thank you so much. We can wrap up right here. Thank you very much. Again, thank you to our panelists. Thank you, Paul, Dr. Devesh, Jeff, Sarah, and everybody else. We'll have a lunch break now and we'll reconvene at 13:15 for our discussion. Yeah, more discussions on DNS abuse mitigation. Thank you very much. Enjoy your lunch.

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