

ICANN | GAC

Governmental Advisory Committee

11 May 2026

Tripti Sinha
Chair
ICANN Board of Directors

**Subject: Advancing Policy Implementation on Collection and Publication of Legal Entities
Domain Name Registration Data**

Dear Tripti,

In its recent review of progress on the Expected Outcomes of the [GAC Annual Plan 2025/2026](#), GAC leadership determined that work to enable **the collection and publication of legal entities' registration data**¹ had not progressed since the related EPDP Phase 2A Policy Recommendations were [adopted by the ICANN Board](#) in March 2022.

Previously, In the [ICANN82 GAC Seattle Communiqué](#) (17 March 2025), the GAC had already stated on this matter²:

When reviewing the progress of implementation of its strategic plan, the GAC noted concerns related to one of its expected outcomes for 2024- 2025, “to track developments related to the collection and publication of registration information related to legal entities.” In particular, the GAC is concerned by the lack of any progress regarding the implementation of EPDP Phase 2A recommendations, which the Board adopted in 2022. The GAC reiterates its position expressed in the ICANN77 Communiqué that “contracted parties should collect and make data of legal persons publicly available.”

¹ See Expected Outcome 5.1.3 on p.10: “The GAC will continue to track developments related to the collection and publication of registration information related to legal entities including expected work by ICANN and the technical community to develop any necessary standards needed to facilitate differentiation between legal and natural person registration data within EPDP and RDAP”

² See section IV.1.d on p.8 Issues of Importance to the GAC, Domain Registration Data, Other Public Policy Concerns Regarding Registration Data

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The GAC then took note of the [ICANN Board Comments on the GAC Seattle Communiqué](#) (4 April 2025), in particular that:

EPDP Phase 2A recommendations are in the queue for implementation, which is subject to the completion of EPDP Phase 1 implementation work now underway.

Given the understanding stemming from updates during ICANN85 and confirmed recently in the [ICANN Board Comments on the ICANN85 GAC Mumbai Communiqué](#) (20 April 2026) that the EPDP Phase 1 IRT has now concluded its work and that “ICANN org is preparing to update the Registration Data Policy with the 24-hour Urgent Request timeline language [...]”, the GAC is now seeking confirmation of ICANN org’s timeline regarding the implementation of the EPDP Phase 2A policy recommendations consistent with the Board resolution of 10 March 2022.

The GAC stands ready to join an Implementation Review Team and provide appropriate public policy perspective on this important ICANN policy matter.

Sincerely,



Nicolas G. Caballero

Chair, Governmental Advisory Committee (GAC)

Internet Corporation for Assigned Names and Numbers (ICANN)