

10 July 2026

GNSO Council Review of ICANN86 Sevilla GAC Communiqué

TO: Tripti Sinha

Chair, ICANN Board of Directors

CC: Nicolas Caballero, GAC Chair

Dear Tripti,

On behalf of the GNSO Council, we are hereby transmitting to you the GNSO Council's review of the Sevilla GAC Communiqué Issues of Importance following adoption by the Council at its 9 July meeting.

The GNSO Council's review of each GAC Communiqué is an effort to provide feedback to you, in your capacity as members of the ICANN Board, as you consider issues referenced in the Communiqué that we believe relate to policies governing generic Top-Level Domains. Our intent is to inform you and the broader community of gTLD policy activities, either existing or planned, that may directly or indirectly relate to advice provided by the GAC. The GNSO Council hopes that the input provided through its review of the GAC Communiqué will enhance co-ordination and promote the sharing of information on gTLD related policy activities between the GAC, Board and the GNSO.

Kindly,

Susan Payne
GNSO Chair

GNSO COUNCIL REVIEW OF ISSUES OF IMPORTANCE CONTAINED IN THE [ICANN86 GAC COMMUNIQUE](#)¹

Topic	Details	To which group(s) is the GAC text directed?	Does the issue of importance concern an issue that can be considered within the remit ¹ of the GNSO? (yes/no)	How has this issue been/is being/will be dealt with by the GNSO?	Does the GNSO want to provide additional feedback to the Board, the GAC, and/or another group? Please specify the response, target audience, and suggested method of communication or engagement (for example via this template, correspondence, and/or dialogue).
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 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	GNSO Council, GNSO WG PDP1,	Yes	The DNSAM PDP1 has achieved considerable progress since starting work at ICANN 85 Mumbai. PDP1 is already working on recommendation language, looking at scoped Impact Assessments, and will soon start working on drafting its Initial Report. The current timeline for the delivery of the Final Report, captured in the	As the GAC Communique notes, various topics have arisen during the WG discussions that are out of scope for this particular PDP, but which may merit future work. The DNSAM PDP1 WG Leadership noted that they will share, via the Council Liaison, a list of such potential topics that come up during this PDP (but are out of scope)with the GNSO Council for its further consideration. The DNSAM PDP1 WG is still deliberating and working on its Recommendations, and GAC input, along with that of other WG participants, is being taken into consideration.

¹ As per the ICANN Bylaws: ‘There shall be a policy-development body known as the Generic Names Supporting Organization (GNSO), which shall be responsible for developing and recommending to the ICANN Board substantive policies relating to generic top-level domains.

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	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.			Working Group's work plan, is May 2027.	

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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 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	SupRec Team, GNSO Council, IRT, ICANN Org	Yes	ICANN announced that as of 12 May 2026, the Registration Data Policy has been updated to include requirements for ICANN contracted parties to respond within 24 hours to urgent requests for the lawful disclosure of generic top-level domain nonpublic registration data from authenticated requestors	The GNSO Council acknowledges the GAC’s emphasis on the timely and effective implementation of a law enforcement authentication mechanism to facilitate the 24-hour response timeline for Urgent Requests. The Council confirms that the SSAD Supplemental Recommendations Team (SRT) is actively deliberating on the topic of authentication of requestors for both urgent and non-urgent data access requests. The SRT recognizes that this work intersects with the PSWG’s efforts to authenticate law enforcement, as well as with the Registration Data Policy, and is working to avoid conflicts between all of these interrelated workstreams. The Council emphasizes the need to maintain a clear distinction between policy and implementation to avoid reopening adopted recommendations.

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	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.				
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	SupRec Team, GNSO Council, ICANN	Yes	The GNSO Council established a Supplemental Recommendations Team (SRT) in May 2026. The SRT is making progress in providing SupRecs for the SSAD recommendations. The current timeline for delivering SupRecs to Council is planned for Feb/March 2027.	The GNSO Council appreciates that the GAC has consolidated its views regarding a centralized system to access non-public domain name registration data in this Communiqué. The Council has taken on the task of developing Supplemental Recommendations for the original SSAD policy recommendations via a Supplemental Recommendations Team (SRT) composed of Councilors and other subject-matter experts from the ICANN Community. The SRT plans to cover each of the elements the GAC enumerates here in the course of its work. Council appreciates that the GAC has appointed members to participate in this SRT.

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	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.				
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 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	GNSO, IRT, SupRec Team,	Yes	Implementation of PPSAI is the responsibility of Org, supported by an IRT composed of community members. The GNSO Council has appointed a liaison to the IRT. The GNSO's SSAD SRT is developing Supplemental Recommendations relating to the handling of requests for disclosure of registration data. The SSAD SRT's	The GNSO Council welcomes the GAC's continued engagement on PPSAI and notes its support for accreditation, transparency of Privacy and Proxy Service usage, and integration with registration data access mechanisms, while ensuring implementation practicalities remain focused on accredited providers within established direct contractual boundaries. The Council further notes that PPSAI implementation work is currently focused on operationalizing the intent of the PDP Final Report, with the Implementation Review Team (IRT) actively considering how the Consensus Policy applies across applicable Privacy and Proxy Service

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	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.			Assignment Form reflects the Board's request that the SRT consider "Confirmation of how the mechanism can be used to make and respond to requests for gTLD nonpublic registration data for underlying affiliated privacy/proxy domains."	providers, including registrar-operated, and affiliated services. The Council also notes that PPSAI implementation work remains ongoing and is addressing the areas identified by the GAC within the scope of existing policy outputs. The Council continues to engage through the PPSAI IRT and related coordination mechanisms and will monitor implementation progress, alongside opportunities for further dialogue as appropriate.

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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	GNSO Council	Yes	The Council notes that the issue of the time period for registrant contact verification was discussed in the Council small teams on both DNS Abuse and Accuracy, and was included, together with other potential issues for future policy work, in the DNS Abuse Mitigation Final Issues Report. The Council is developing a method to prioritize its work and will use it to prioritise those issues identified in the Final Issues Report as suitable for future policy development work.	The GNSO Council acknowledges the GAC's continued interest in improving the accuracy of domain name registration data, and notes its interest in reviewing the 15-day verification timeline included in the Registrar Accreditation Agreement (RAA). The Council notes the ongoing information exchange through the Council and GAC topic leads, including the topical information session held during ICANN 86, and looks forward to continued engagement. The Council also notes that additional, more contemporary data sources are becoming available and encourages their consideration alongside existing data to help inform future discussions. The Council further recognizes that any future consideration of similar changes would require alignment

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	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.			The Council recognizes and appreciates that there are efforts and voluntary initiatives outside its policy development remit that collectively contribute to DNS Abuse mitigation and encourages continued constructive collaboration with an eye to progress. The Council has considered GAC priorities when deciding on PDP1 and PDP2, which align with the expectations from the GAC	among ICANN org, ICANN Board, GAC and the contracted parties, as well as careful assessment of timing, feasibility, and implementation impacts.

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				Communique in Prague.	