

24 August 2026

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

Nicolas Caballero
Chair, Governmental Advisory Committee

Dear Nicolas,

Thank you for your [letter](#) of 11 May 2026 inquiring about the implementation timeline for the Phase 2A recommendations (hereafter, Recommendations) of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data concerning the gTLD registration data of legal persons. We appreciate the Governmental Advisory Committee's (GAC) interest in this topic and readiness to participate in supporting the implementation work.

The EPDP Phase 2A Team determined not to modify existing Consensus Policy requirements with respect to any differentiation between registration data pertaining to legal versus natural persons. The [Registration Data Policy](#) implemented pursuant to the EPDP Phase 1 Recommendations permits, but does not require, registry operators and registrars to consider whether registration data pertains to a legal person or contains personal data in determining whether to apply the policy's requirements for redaction of registration data in the Registration Data Directory Services (RDDS). However, the Recommendations do call for the issuance of guidance to contracted parties concerning differentiation in the form of best practices, as well as creation of a field to support differentiation.

The Recommendations are in the format of best practices and will not create contractual obligations for contracted parties. For the purposes of implementation, the four Recommendations fall into two different groups:

- I. Recommendations to draft and publish new best practices for contracted parties.¹
 - Recommendations 1, 2, and 4
- II. Recommendations directed at ICANN org.
 - Recommendations 1 and 3

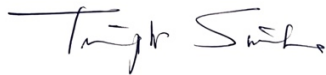
For the first group, the deliverable is a best practices document for contracted parties. The second group of Recommendations will require coordination with the technical community to review addition of differentiation fields in Extensible Provisioning Protocol (EPP), with the result of an updated Registration Data Access Protocol (RDAP) Profile.

This work engages cross-functional resources, including our planning prioritization, operational planning, and budget cycles. Subject to the completion of existing projects using dedicated implementation resources, we anticipate being able to begin Phase 2A

¹ See [ICANN org liaison input](#) to WG regarding implementation of Phase 2A recommendations.

implementation in FY2027. ICANN org values the community's input in setting priorities throughout the operational and budget planning process. The planning cycle for FY2028 has begun, and we encourage the GAC's continued participation. ICANN org will take into account the GAC's emphasis on the work on this topic and continue to provide community updates on this and other policy implementation efforts.

Sincerely,



Tripti Sinha
Chair, Board of Directors
ICANN