

RrSG Public Comment: [Draft Guidelines for Advancing UA Adoption](#)

13 April 2026

The Registrar Stakeholder Group (“RrSG”) appreciates the opportunity to provide a comment on the Draft Guidelines for Advancing UA Adoption and thanks the Universal Acceptance (UA) Expert Working Group (EWG) for their efforts in drafting these updates.

The Registrar Stakeholder Group is the representative body of ICANN-accredited domain name registrars. Operating with numerous subgroups focused on specific topics of interest, the RrSG contributes to policy development, issue advocacy, and negotiations with ICANN. We work to advance the interests of registrars and our customers by promoting data-driven policy outcomes. Learn more about the RrSG on our website rrsg.org.

The RrSG is overall supportive of these draft Guidelines and the general push towards UA Adoption.

The RrSG has several specific comments:

Charter Question 6: *How may ICANN org further encourage the DNS industry, including gTLD and ccTLD registry, registrars, and resellers, to support UA in their systems during the registration process?*

Draft Guideline 22 Develop Messaging for the DNS Industry includes “UA adoption needs technical updates for interoperability, not just for specific regions and languages, but for enabling a global Internet. This is relevant for the DNS industry as a whole. i. This includes updating customer and user interfaces and implementing UA-compliant Extensible Provisioning Protocol (EPP) and Registration Data Access Protocol (RDAP).”

The RrSG is supportive of this Guideline only as long as these remain guidelines or are addressed via direct communication with registrars, with no mandatory requirement to mend or update, particularly as the realities of upstream dependencies requiring UA updates continue to constrain registrars, and must be acknowledged.

Draft Guideline 24. Consider Developing an Issues Report for UA Adoption. *The ICANN community and the ICANN Board may discuss developing an issues report to identify the existing gaps in registries and registrars. The community can explore developing policies for promoting UA adoption across registries and registrars, including possible incentive-based approaches. This work should align with ICANN’s Strategic Plan to promote consumer trust. UA issues may dilute consumer trust in the DNS and the globally unique and authoritative root system maintained by ICANN.*

The RrSG generally supports the development of an Issues Report for UA Adoption, keeping in mind that any report that is too narrowly tailored risks misallocating responsibility for gaps

that largely originate upstream in browsers, email clients, and enterprise platforms. **ICANN should include in this Issues Report an ecosystem gap analysis in order to fully understand and document the chain of responsibility inherent in UA Adoption.**

Further, the RrSG notes that Registrars operate with a variety of different business models, and a one-size-fits-all policy approach in the Issues Report may not account for the diversity of registrar operations, customer bases, and technical environments across our industry.

While UA acceptance is important for the development of the Internet, attempting to incentivise behaviour that may not be otherwise operationally or commercially beneficial to the business could lead to gaming and market tempering.

Charter Question 10: *What aspects of UA adoption should be measured generally, as well as specific to different types of stakeholders, to create awareness of the gaps and gauge progress over time? Who would be good collaborators, and how do we encourage self-reporting on these indicators by the stakeholders?*

Draft Guideline 43. Indicators focus on multiple stakeholders and on the different aspects of UA-readiness. The indicators should cover measuring the following aspects over time, with some example measures indicated for each aspect below:

The RrSG is supportive of reporting on these key indicators as long as this information is provided in aggregate, not published for individual Registrars.

Thank you,

Owen Smigelski
Registrar Stakeholder Group Chair