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AT-LARGE ADVISORY COMMITTEE

ALAC Statement on the Registration Data Request Service Standing Committee Report for GNSO Council Review

Preamble

On 19 August 2025, the Public Comment proceeding opened for the [Registration Data Request Service Standing Committee Report for GNSO Council Review](#). An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Consolidated Policy Working Group reviewed the Registration Data Request Service Standing Committee Report for GNSO Council Review and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

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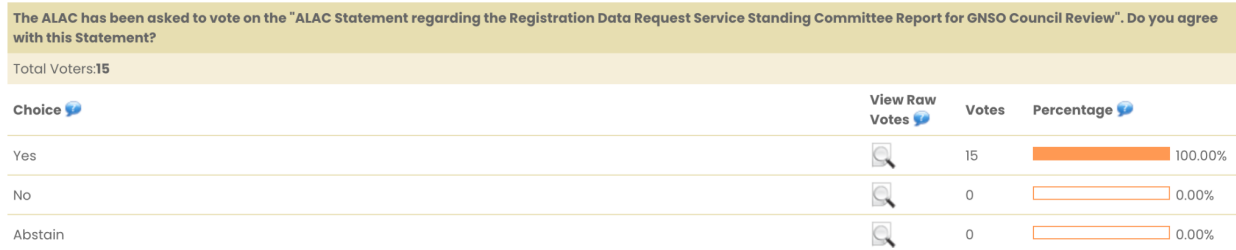
Ratification Record

On 19 August 2025, the Public Comment proceeding opened for the Registration Data Request Service Standing Committee Report for GNSO Council Review. On 27 August 2025, Alan Greenberg discussed the comments for the ALAC statement during the Consolidated Policy Working Group (CPWG) call. The At-Large CPWG decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. Aaron Mbah, Adarsh BU, Alan Greenberg, Eunice Perez Coello, and Hadia Elminiawi volunteered to draft the initial ALAC statement for CPWG consideration and ALAC endorsement.

On 10 September 2025, the initial draft statement was shared with the CPWG for review and input. On 24 September, the At-Large Public Comment Statement was finalized. The ALAC

Chair, Jonathan Zuck, requested that the Public Comment Statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 29 September 2025, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor. 0 votes against, and 0 abstentions. Please note 100% of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Aziz Hilali, Bukola Oronti, Claire Craig, Eunice Alejandra Perez Coello, Emilia Zalewska-Czajczynska, Jonathan Zuck, Judith Hellerstein, Justine Chew, Kathleen Scoggin, Lilian Ivette De Luque, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu, Shah Zahidur Rahman. You may view the results here:



ALAC and At-Large Community Comments

The ALAC/At-Large, representing the interests of Internet end-users, generally agrees with the RDRS (Registration Data Request Service) Standing Committee Findings Report, while identifying some aspects that could benefit from further refinement in order to ensure a more inclusive, transparent, and sustainable system.

Recommendation 1 – Continuation of the RDRS beyond the pilot

The RDRS has proven to be useful during its pilot phase. In just 18 months, tens of thousands of queries and thousands of requests were recorded, confirming that there is genuine demand from different stakeholders. Suspending it now would create a gap that would affect both legitimate users and the community at large.

While the pilot helped avoid such a gap and allowed valuable experience to be accumulated, it also exposed significant shortcomings. One of these is the lack of uniformity in how requests are submitted and how registrars respond to them, which creates uncertainty and reduces confidence in the system. This is not a new issue: the eleven recommendations that achieved full consensus in EPDP (Expedited Policy Development Process) Phase 2 had already emphasized that consistency was an indispensable requirement.

This shortcoming is compounded by limited coverage. Currently 93 registrars participate in the system, covering about 60 percent of domains under management (DUMs), which means that a significant portion of legitimate requests cannot be processed. This limitation not only reduces

the effectiveness of the RDRS but also reinforces the perception that access depends on arbitrary factors rather than on a common framework.

Another factor contributing to that perception is the absence of ccTLDs (country-code Top-Level Domains). Under the WHOIS system, these operators were not obligated to participate but were encouraged to do so, although participation was optional and limited; the RDRS offers an opportunity to invite voluntary ccTLD participation in a structured way, broadening scope while recognizing operational and contractual challenges. Their absence leaves out relevant information and undermines the coherence of the service, particularly at a time when the community expects greater integration of efforts.

The handling of data related to privacy/proxy services is also problematic. In practice, this information is fragmented, forcing users to make additional requests outside the RDRS. This duplication not only complicates the process but also undermines the system's efficiency as a centralized tool for requesting registration data disclosure.

In addition, the Standing Committee's report suggests that the Accreditation Authority would take on most of the accreditation work. Building on the EPDP Phase 2 recommendations, this role could be complemented by distributed Identity Providers (IdPs), ensuring that responsibilities are shared, efficiency is increased, and legitimacy is strengthened.

The ALAC/At-Large recommends that the RDRS continue beyond the pilot as a stopgap measure while a long-term solution is developed, since its interruption would create a harmful gap for confidence and security in the Internet ecosystem.

In the same vein, the ALAC/At-Large considers it important to establish clear guidelines that ensure consistency in the submission of requests and in registrar responses, so that the system provides greater predictability and trust for users.

Likewise, the ALAC/At-Large stresses the need to encourage the participation of all accredited registrars in order to overcome the current limited coverage and to ensure that the service reflects the domain name ecosystem more adequately.

Moreover, the ALAC/At-Large proposes formally inviting ccTLDs to participate on a voluntary basis, following the precedent of WHOIS, which could broaden the scope of the system without imposing contractual obligations, but also requires addressing technical and policy challenges.

It should also be noted that the ALAC/At-Large regards it as essential to promote the disclosure of information from privacy/proxy services whenever legally permissible, in order to avoid unnecessary duplications and bring greater coherence to the system.

At the same time, the ALAC/At-Large supports making it explicit that Identity Providers should play a central role in the accreditation process, as envisioned in EPDP Phase 2, in order to achieve a more balanced, legitimate, and sustainable system.

Recommendation 2 – Accreditation of Requestor Groups

Accreditation is an indispensable component for the RDRS to evolve from a pilot into a robust and reliable system. Experience has shown that in the absence of a clear validation process, delays and uncertainty arise. Even during the pilot, there were cases where requests were misclassified as coming from law enforcement authorities, which highlights the need for a mechanism that properly certifies who is requesting the data and for what purpose.

For this reason, it is necessary to consider a model that can begin gradually and in phases. This approach, consistent with the EPDP (Expedited Policy Development Process) Phase 2, would allow the system to start with clearer groups — such as law enforcement agencies — and later expand to other qualified actors with legitimate interests.

The ALAC/At-Large considers it essential that accreditation become a central component of the RDRS and be implemented gradually and by groups, ensuring an orderly and equitable rollout.

In addition, the ALAC/At-Large stresses the importance of ensuring that accreditation is not restricted exclusively to LEAs (Law Enforcement Agencies), but could also be expanded to include segments of the legal profession, journalists, and researchers capable of proposing reliable and feasible models.

Likewise, the ALAC/At-Large highlights that Identity Providers (IdPs) should be explicitly incorporated as operational actors in managing accreditation, as anticipated in EPDP Phase 2, in order to distribute responsibilities and strengthen the legitimacy of the process.

Recommendation 5: Consideration regarding next steps on EPDP Phase 2/SSAD

The Standing Committee notes that the package of eighteen recommendations emerging from EPDP (Expedited Policy Development Process) Phase 2 was conceived as an interdependent whole. However, in its current form the model faces viability challenges, as it is characterized by excessive complexity and the high costs identified in the ODA (Operational Design Assessment).

The report suggests that the ICANN Board consider rejecting the entire package and that the GNSO Council reexamine it, issuing supplementary recommendations. The pilot experience of the RDRS, along with the progressive implementation of RDAP (Registration Data Access Protocol), provides valuable inputs for rethinking a leaner and more cost-effective model.

In addition, the RDRS has shown that the majority of requests come from law enforcement agencies and intellectual property holders, reflecting their legitimate need for access under the GDPR and other privacy legislation. At the same time, smaller actors — such as civil society organizations, journalists, and researchers — often face barriers linked to lack of familiarity with the system, limited resources, and the absence of tailored support. Addressing these challenges

through outreach, capacity-building, and clearer guidance could help ensure that legitimate requestors across different sectors are able to make effective use of the system.

The financial projections of the ODA have also been questioned. Several assumptions appear to overestimate costs, which could lead to the perception of an unsustainable system. A more critical review of those calculations is necessary in order to design a viable long-term framework.

The ALAC/At-Large considers it essential that any review of the SSAD recommendations build on existing inputs, including, if still appropriate, the eleven full-consensus recommendations of EPDP Phase 2, the RDRS pilot experience, and the implementation of RDAP, in order to construct a simpler and more cost-effective model.

Furthermore, the ALAC/At-Large proposes that, in the context of designing the next-generation disclosure framework, specific support and capacity-building mechanisms be developed for civil society organizations, journalists, and researchers, in order to reduce entry barriers and ensure that these sectors can make effective use of the system on equal footing.

At the same time, the ALAC/At-Large highlights that the ICANN Board must rigorously review the financial and usage assumptions contained in the ODA and assume its responsibility for defining a sustainable cost framework, since this issue lies beyond the scope of GNSO Consensus Policy.

Annex

The ALAC/At-Large notes that the RDRS (Registration Data Request Service) has become the only ICANN-facilitated centralized channel for accessing non-public registration data following the implementation of the GDPR (General Data Protection Regulation). While law enforcement agencies and intellectual property holders continue to have legitimate avenues of access under privacy legislation, the RDRS provides added value by offering a transparent and predictable mechanism that operates consistently across registrars.

At the same time, the ALAC/At-Large observes that the pilot demonstrated areas where improvements are needed to meet end-user expectations. Inconsistencies in registrar responses create uncertainty and reduce confidence in the system, particularly for those facing online harms such as phishing who require timely recourse.

These challenges are compounded by limited coverage. With only about 60 percent of accredited registrars participating, many requests cannot be processed through the RDRS. This partial participation results in uneven experiences for requestors, weakening the system's reliability and leaving users without equal opportunities to access information. Expanding registrar participation would therefore be a key step toward strengthening trust and effectiveness.

Within this context, the ALAC/At-Large recognizes that the majority of requests legitimately come from law enforcement agencies and intellectual property holders, reflecting their stronger legal basis under the GDPR (General Data Protection Regulation) and related privacy frameworks. At the same time, smaller actors — such as civil society organizations, journalists, and academic researchers — encounter practical barriers, including lack of familiarity with the system, limited resources, and absence of tailored support. The ALAC/At-Large therefore believes that targeted outreach, education, and capacity-building would help ensure that all legitimate requestors are able to use the system effectively.

The ALAC/At-Large also highlights that the financial sustainability of the model has a direct impact on end-users. If the projections contained in the ODA (Operational Design Assessment) are not rigorously reviewed, there is a risk of sustaining a model that is too costly or complex. Such a scenario would undermine digital trust and restrict access to information essential for Internet security. A careful reassessment of assumptions is necessary to ensure that the system remains both viable and responsive to community needs.

For these reasons, the ALAC/At-Large holds that the future of the RDRS must place end-users at the center. A model that prioritizes transparency, equity, and accessibility will ensure that the system fulfills ICANN's mission to serve the global public interest and that the Internet remains a trustworthy resource for all.