

RrSG Public Comment: [Registration Data Request Service Standing Cmte. Report for GNSO Council Review](#)

29 September 2025

The RrSG appreciates the work of the RDRS Standing Committee and SC leadership team as well as ICANN Org in drafting the Report for the GNSO Council's review.

The Registration Data Request Service (RDRS) project is an important step towards the ICANN Board's data-driven decision on how to proceed with the EPDP Phase 2 Recommendations for a Standardized System for Access and Disclosure of non-public gTLD Registration Data.

The RrSG considers the RDRS project a great success as it did gather relevant and useful data; with this information on hand, the Board has the data it requires to make this decision.

The metrics obtained and costs incurred through **this pilot project shows that the cost of operating and maintaining the RDRS, considered along with the limited volume of usage, outweighs value the service provides to interested requestors.** Further, building the SSAD as envisioned by the EPDP Phase 2 Working Group would incur even more significant costs without certainty that request volume would increase (to better distribute those costs across requests) and without resolving the core dissatisfaction experienced by requestors (unrealistic expectation of guaranteed and/or automated disclosure of data).

The RrSG supports continued operation of the RDRS as a voluntary system for registrars; funding of this continued operation must be done on a cost-recovery basis with costs paid by the users of the system—requestors of registration data.

Alternatively the RDRS could be maintained as-is without further improvements, offering basic functionality to meet the needs of requestors without committing further funds from ICANN Org.

Next Steps

The RDRS Report offered four possible paths forward:

1. Approval of EPDP Phase 2 SSAD recommendations (in current or modified format) which would replace the SSAD proof of concept;
2. Determination that adoption of EPDP Phase 2 SSAD recommendations is not in the best interest of the ICANN community or ICANN and termination of SSAD proof of concept;
3. Modification of EPDP Phase 2 SSAD recommendations by GNSO Council informed by SSAD proof of concept findings;
4. A variation and/or combination of the above scenarios.

The RrSG supports the third path. The data gathered through the RDRS project has demonstrated that adoption of the SSAD recommendations is not in the best interest of the DNS or the ICANN community. That said, there does seem to be limited appetite for a centralised platform to manage the disclosure request process.

The RrSG supports ongoing Community efforts to explore a long-term, permanent solution system. In this regard, the RrSG would support maintaining the RDRS as a voluntary system for registrars to use, with requestor billing for cost recovery, either in the RDRS's current form or with the Standing Committee's proposed enhancements and an ongoing process for suggesting further improvements.

RDRS SC Recommendations to GNSO Council

The RrSG offers the following input on the specific recommendations made by the Standing Committee to the GNSO Council.

Recommendation 1: Continue the RDRS beyond the pilot period.

The Registrar Stakeholder Group (RrSG) supports the Standing Committee's (SC) recommendation as it is currently written, including the requirement that the RDRS remain voluntary for registrars to participate in. While it is a useful system for many registrars, other registrars have their own processes or systems in place to manage requests; further, as participation in the RDRS is not required under Policy it cannot be mandatory for anyone to use.

Additionally, **the RrSG supports ongoing Community efforts to explore a long-term, permanent solution or a successor system.** In this area, the RrSG would support maintaining the RDRS as a voluntary system for registrars to choose to participate in, with requestor billing functionality for cost recovery, either in the RDRS's current form or with the Standing Committee's proposed enhancements and an ongoing process for suggesting further improvements.

The RrSG would not support building the SSAD as envisioned by the EPDP Phase 2 Working Group. The SSAD was intended to process disclosure requests and responses, including transmitting their full content to the requestor; the RDRS offers the request functionality, but no direct interaction between parties and no provision of the disclosed data through the system. Leaving aside its significantly high costs, the SSAD model is untenable from a data protection and liability perspective. The RDRS, by contrast, serves solely as a request relay and a logging mechanism for registrar responses. With the understanding of operational and maintenance costs and request volume gathered from this project, the RrSG thinks it is clear that building the full SSAD is not cost-effective.

Recommendation 2: Allow for authentication of interested requestor groups, beginning with law enforcement.

The RrSG supports the SC's recommendation as it is currently written. Understanding a requestor's identity and affiliation is an important part of the analysis when reviewing disclosure requests; as such, the RrSG sees an authentication or accreditation mechanism which would confirm that information as being a useful component of a viable disclosure system.

Recommendation 3: Implement Key System Enhancements to sustain and evolve RDRS post-pilot while more policy work is underway.

The RrSG supports enhancement of the RDRS with technical changes only if the cost of these updates is covered by requestors using the RDRS. No further ICANN funds should be dedicated to the RDRS.

3.1. API (Application Programming Interface) Integration for both Registrars and Requestors.

The RrSG supports the SC's recommendation as it is currently written. The API to manage requests through RDRS would help add efficiency to registrar processes.

Additionally, the ability to communicate directly with requestors through the RDRS itself will be a welcome enhancement for many registrars. This communication should be limited to requests for additional information, from the requestor or responding registrar, but must not permit the disclosure of registration data directly through the RDRS.

3.2 User Experience (UX) Redesign

The RrSG partially supports recommendation 3.2. Specifically, the RrSG supports the SC's recommendation that ICANN org engage a UX designer to improve the request forms in order to ensure the forms are simple and intuitive for requestors. A clear and simplified form will provide a better user experience for the requestors and registrars alike.

3.3. Optional ccTLD participation

The RrSG does not support the Standing Committee's recommendation as currently written.

Adding ccTLDs to RDRS raises several policy and operational questions. The RrSG notes that the ccNSO itself must be involved in any decision relating to ccTLD operations.

- The RDRS is a system used by registrars and requestors; registries do not have access. What interface would the ccTLD registry use to respond to requests?
- As ccTLDs are not bound by ICANN policies, there would be gaps in requirements for ccTLDs responding to requests. What happens if the registry does not respond in the manner required under ICANN policy?
- If a ccTLD is enabled in RDRS, is the request sent to the registry, the registrar, or both? What happens if the registry and registrar reach different disclosure decisions?

At the most, it may be appropriate for a registrar to opt in to process requests for ccTLD data disclosure through RDRS.

The RrSG also notes a minor mistake to the numbering which appears to be incorrect (this is noted as item 2.3 but should be 3.3).

Recommendation 4: Consider further policy work in the following areas.

4.1. Privacy/Proxy Data

The RrSG does not support SC's recommendation that the GNSO Council should consider further policy development work concerning privacy/proxy data in RDRS.

As the SC notes, there is ongoing work being conducted for the accreditation of privacy and proxy providers, and the RrSG recognizes the hard work and expertise of the PPSAI IRT and GNSO Council Small Team on this topic; any further policy recommendations should wait until this work is completed in order to avoid possible duplications and contradictory outcomes.

4.2. Inclusion of RDRS links in RDAP responses

The RrSG supports the SC's recommendation as currently written.

The RrSG notes that it may be counterintuitive to expect registrars not using RDRS to refer to RDRS in their RDDS output. As such this requirement may be appropriately limited to participating registrars.

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

The RrSG supports the SC's recommendation as currently written.

Evaluation of SSAD policy recommendations

Regarding the analysis of the EPDP Phase 2 recommendations, the RrSG offers the following input. The RrSG notes that any further costs should be funded on a cost-recovery basis with fees paid by system users.

Recommendation 1 & Recommendation 2:

The RrSG considers user authentication to be useful but not an essential or mandatory component of a future system. Request processing has been successful so far without this functionality, showing that it's possible to live without it. The RrSG does agree that some concern around fraudulent requests can be alleviated by authenticating requestor identity and as such supports the joint Governmental Advisory Committee and GNSO efforts to develop an authentication process for law enforcement.

Recommendation 3

The RrSG supports the Standing Committee's review of this recommendation.

Recommendation 4

The RrSG supports the Standing Committee's review of this recommendation.

Recommendation 5

The RrSG notes that some of what is proposed here may not be implementable in the current RDRS; "*registrars could be required to provide a clear reason for denial or request additional info if needed*" requires free-form entry for all denial reasons (currently only available if the "other" reason is selected). Separately, whether the reason for denial will be accepted as "clear" is quite subjective.

The RrSG supports the idea that a two-way communication feature in RDRS could help improve request processing on both sides. That said, this must be encrypted or otherwise

secured against unauthorized access, and we note that even ICANN may not have appropriate reason to access those interactions as it could include Personal Data which ICANN has no basis to process.

Recommendation 6

The RrSG notes that the definition and timing requirements for “Urgent” requests are being handled by the EPDP Phase 1 Implementation Review Team and considers it crucial to ensure that any related requirements match those determined by that IRT.

Further, any Registrar participating in the RDRS should be able to decide if they will accept Urgent requests through RDRS or not. The RDRS does not immediately notify registrars of requests, so in a situation meeting the Community definition of Urgent it is not the appropriate venue for initiating such a request.

Recommendation 7

The RrSG supports the Standing Committee’s review of this recommendation.

Recommendation 8

The RrSG notes the level of effort at a “Medium” and is concerned that building in functionality envisioned here (automated processing of requests; reexamination requests; bulk processing) would be a “Large” effort instead.

Recommendation 9

The RrSG notes that the Recommendation requires the automated transmission of well-formed requests to the registrar of record, which the RDRS does not offer. This functionality would greatly improve the registrar’s experience and ideally should be considered separately from the API work as not all participating registrars will want to implement an API but it is likely that all participating registrars would find it useful to receive notification when new requests are submitted.

The major intent of Recommendation 9 was to automate disclosures; this Pilot has confirmed that this is not possible to require from all participants within the boundaries of registrar privacy and data protection obligations. As such, although the technical level of effort may be “Low” the overall impact on the intent of the recommendations is significant.

Recommendation 10

The RrSG does not consider that any SLAs are required for the RDRS.

Recommendation 11

The RrSG supports the Standing Committee’s review of this recommendation.

Recommendation 12

The RrSG supports the Standing Committee’s review of this recommendation.

Recommendation 13

The RrSG supports the Standing Committee's review of this recommendation.

Recommendation 14

The RrSG strongly supports maintaining the requirement that the RDRS will be funded by requestors on a cost-recovery basis. Any further work done on RDRS should occur only after billing functionality is implemented.

Noting that the RrSG does not support the implementation of the SSAD recommendations, should an Accreditation Authority be established the RrSG would support the suggested modification suggested of SSAD Recommendation 14.5; the accreditation provider is the most appropriate party to determine how their costs should be recovered, however this seems to already be accommodated in the current text.

Recommendation 15

The RrSG supports the Standing Committee's review of this recommendation.

Recommendation 16

The RrSG supports the Standing Committee's review of this recommendation.

Recommendation 17

The RrSG supports the Standing Committee's review of this recommendation.

Recommendation 18

The RrSG supports the Standing Committee's review of this recommendation.

Recommendation 6: Maintain the current Standing Committee with narrowed Scope.

The RrSG supports the SC's recommendation as written, with the caveat that the RrSG does not support additional dedication of resources (financial or personnel) to the RDRS until the Board's decision has been reached. At that time, either the RDRS will be maintained as the long-term system in which case it makes sense to enhance the RDRS or the Board will have decided not to maintain it and so no further resources will be needed.

Lessons Learned

SSAD policy recommendations

The RrSG thanks the RDRS Standing Committee for their review of the SSAD recommendations and refers to our comments under Recommendation 5 above.

We note that (as mentioned above) the RrSG does not support building the SSAD as envisioned by the EPDP Phase 2 Working Group. The RrSG would support maintaining the RDRS as a voluntary system for registrars to choose to use, with requestor billing functionality for cost recovery, either in the RDRS's current form or with the Standing Committee's proposed enhancements and an ongoing process for suggesting further improvements.

System Development of RDRS

The RrSG appreciates the intent of offering PGP-encrypted transmission of requests to registrars and hopes that in the future before significant development efforts are undertaken there can be a review of the intended solution which would surface any discrepancy of expectations before work is initiated, hopefully resulting in more efficient work and less implementation of solutions which are not technically feasible for one of the involved parties.

Participation

The RrSG believes that the level of participation in the RDRS project is sufficient to base decisions on.

Recommendation #1- Accreditation & Recommendation #2 – Accreditation of governmental entities

The RrSG is significantly concerned by the rate of requestors willing to improperly identify themselves as representing Law Enforcement and is open to implementation of an authentication process to reduce this occurrence as well as to building in processes to revoke RDRS access for those users who select LEA inappropriately.

The RrSG supports the Report's comment that *"the onerous part of data disclosure is generally not authentication but rather balancing the requestors' documented proof of purpose/need versus the registrant's right to privacy."*

Recommendation #3 – Criteria and Content of Requests

The RrSG supports further improvement of the user interface including providing in-form guidance or tooltips.

Recommendation #4 - Acknowledgement of receipt and relay of the disclosure request

The RrSG has nothing to add to this consideration.

Recommendation #5 - Response Requirements

The RrSG notes that the opening sentence in this Lesson Learned relates to response timelines and suggests that the Report should refer to the Recommendation 10 analysis which relates to SLAs.

Recommendation #6 - Priority Levels

The RrSG is significantly concerned that requests are inappropriately marked as “expedited” in an effort to get faster attention, and suggests that if the RDRS is maintained long-term then requestors should lose access if they misuse the “expedited” priority level.

Recommendation #7 - Requestor Purpose

The RrSG has nothing to add to this consideration.

Recommendation #8 - Contracted Party Authorization

The RrSG agrees that “[b]y providing more clear communication and documentation of disclosure decisions, better requests can be formulated and the expectations of requestors (and thus the value that they then perceive in the effort and costs of making requests) can be level set” and would appreciate a direct communication method directly within the RDRS, while noting considerations relating to data access noted above.

Recommendation #9 - Automation of SSAD Processing

The RrSG has nothing to add to this consideration.

Recommendation #10 - Determining Variable SLAs for response times for SSAD

The RrSG supports the suggestion of a “pending requestor input” status which would give more insight into why requests remain open for as long as they do.

Recommendation #11 - SSAD Terms and Conditions

The RrSG has nothing to add to this consideration.

Recommendation #12 - Disclosure Requirement

The RrSG has nothing to add to this consideration.

Recommendation #13 - Query Policy

The RrSG has nothing to add to this consideration.

Recommendation #14 - Financial Sustainability

The RrSG appreciates the detailed information obtained through the RDRS pilot project. The information about the cost of building and operating the RDRS, in combination with the data about request rates, is sufficient to understand the per-request cost of RDRS request processing as well as (separately) to further inform the SSAD Operational Design Assessment (ODA).

If the RDRS is to be kept in operation the first update that should happen is to build in a billing function, allowing Recommendation 14 to be fulfilled. Even without any alterations the cost to operate RDRS is \$40,000 per month, this is a significant cost and should not be absorbed without thought.

Looking at the most recent metrics, with total costs of \$2,870,793 (SC Report page 38) and 3,344 total requests (August 2025 [metrics report](#)) an individual request cost \$858.49 USD. Alternatively if only the operational cost is considered (\$1,223,958) with pre-system development costs simply absorbed by ICANN, then the individual request cost would be \$366 USD.

This cost is higher than the RrSG would feel comfortable billing for such a service, but nor would the RrSG consider it appropriate to absorb the fees, as when ICANN pays ultimately the registrant pays. As such, the RrSG believes that the RDRS Pilot Project has successfully determined that building the SSAD would not be in the best interests of the domain name system or Internet Community.

Recommendation #15 – Logging

The RrSG has nothing to add to this consideration.

Recommendation #16 – Audits

The RrSG has nothing to add to this consideration.

Recommendation #17 - Reporting Requirements

The RrSG has nothing to add to this consideration.

Recommendation #18 - Review of implementation of policy recommendations concerning SSAD using a GNSO Standing Committee

The RrSG has nothing to add to this consideration.

Possible Technical Updates

The RrSG suggests prioritizing the enhancement to make “expedited” requests more visible, and cannot imagine why anyone would not want this to be at the top of the list.

The RrSG has significant concern with the suggested “Registration data preservation function in RDRS.” This is a separate process from registration data disclosures and as such is out of scope; the Standing Committee should not permit the expansion of RDRS to other types of request. In addition, preservation requests require legal due process which will not be provided via RDRS, and so the requests should be handled entirely outside of the RDRS.

Again, the RrSG thanks the members of the Standing Committee, its leadership team, and ICANN staff for their work on this pilot project and Report.

Thank you,

Owen Smigelski
Registrar Stakeholder Group Chair