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AL-ALAC-ST-1025-02-00-EN

ORIGINAL: English

DATE: 15 December 2025

STATUS: Ratified

AT-LARGE ADVISORY COMMITTEE

**ALAC Statement on the Timeline for Urgent Requests for Lawful Disclosure of
Nonpublic Registration Data**

Preamble

On 22 October 2025, the Public Comment proceeding opened for the Timeline for Urgent Requests for Lawful Disclosure of Nonpublic Registration Data. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Consolidated Policy Working Group reviewed the Timeline for Urgent Requests for Lawful Disclosure of Nonpublic Registration Data and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

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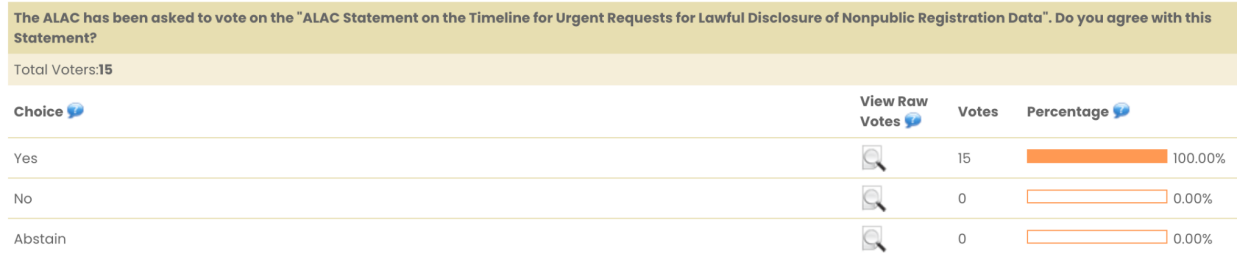
Ratification Record

On 22 October 2025, the Public Comment proceeding opened for the Name Collision IPv6 Research Study. On 3 December 2025, the Consolidated Policy Working Group (CPWG) discussed the comments for an ALAC statement. The CPWG decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. Adebunmi Akinbo, Alan Greenberg, and Hadia Elminiawi volunteered to draft the initial ALAC statement for CPWG consideration and ALAC endorsement.

On 10 December 2025, a draft statement was shared with the CPWG for review and input. On 11 December 2025, 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.

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On 15 December 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): Adebunmi Akinbo, Aftab Siddiqui, Aziz Hilali, Claire Craig, Eunice Alejandra Perez Coello, Emilia Zalewska-Czajczynska, Hannah Frank, Jonathan Zuck, Judith Hellerstein, Justine Chew, Kathleen Scoggin, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu. You may view the results here:



ALAC and At-Large Community Comments

The ALAC and At-Large community welcome the opportunity to comment and respond to the questions presented in this public proceeding regarding the Timeline for Urgent Requests for Lawful Disclosure of Nonpublic Registration Data.

Before addressing the specific questions, we would like to highlight the end-user perspective. Although this public comment is primarily directed at contracted parties and government agencies, end users also have a direct stake in how "urgent requests for lawful disclosure" are handled. Their concerns focus on ensuring swift action in cases involving child exploitation or life threatening situations, where delays in disclosure could cause serious harm. At the same time, privacy and data protection remain critical; timely responses to urgent requests should not introduce privacy risks. Our responses to the questions are as follows

We find that sections 3.8, 3.9 and implementation Note K clearly describe the applicable requirements. However, we have concerns regarding section 10.7.

First, the current text conflates true force majeure conditions with ordinary operational complexity. Including "requests involving a high number of domain names" as an example of force majeure does not seem appropriate, as force majeure refers to external, uncontrollable events-not workload complexity. These two categories must be clearly separated.

Second, the proposed 72-hour response window is incompatible with the very purpose of an "urgent" request as defined in section 3.8. A three-day timeframe cannot reasonably address situations involving imminent harm, and therefore contradicts the intent of creating an urgent request category. For these reasons, the ALAC and At-Large community find that section 10.7 does not meet the requirements for urgent requests and is not fit for purpose.

We thank you again for the opportunity to provide these comments and we look forward to continued collaboration to refine these sections in a way that serves the public interest.