

18 March 2026

RE: GNSO Expedited Policy Development Process (EPDP) [Phase 2 Final Report](#) and the System for Standardized Access/Disclosure (SSAD) Policy Recommendations

Susan Payne
Chair, Generic Names Supporting Organization (GNSO) Council

Dear Susan,

I am writing to you on behalf of the ICANN Board to inform you about the Board's action in relation to the GNSO's Expedited Policy Development Process (EPDP) [Phase 2 Final Report](#) and the System for Standardized Access/Disclosure (SSAD) policy recommendations.

The Registration Data Request Service (RDRS) pilot concluded in November 2025, and the Board would like to express appreciation for the GNSO Council, EPDP Phase 2 team, RDRS Standing Committee, and ICANN community's efforts over the last two years. The Board also recognizes that significant work remains, both in determining next steps for the SSAD recommendations and the subsequent implementation process, and will rely on the Council's continued leadership to bring these efforts to a successful conclusion during the two-year period RDRS will continue operations (December 2025 - November 2027).

The ICANN Board voted not to adopt the 18 SSAD [policy recommendations](#) as a package in its current state in order to trigger the process to develop Supplemental Recommendations, as recommended by the GNSO Standing Committee, agreed in discussion with the GNSO Council, and defined in Annex A, Section 9 of the ICANN Bylaws. This decision also reflects the interdependence of these recommendations, as highlighted in the [EPDP Phase 2 Final Report](#). The Board has taken into account the body of community discussions from the EPDP stage through the RDRS pilot, including reference to:

- [EPDP Phase 2 Final Report](#)
- GAC Advice from [ICANN64](#), [ICANN70](#), and [ICANN79](#)
- [SAC 118: SSAC Comments on Initial Report of the Expedited Policy Development Process \(EPDP\) on the Temporary Specification for gTLD Registration Data Team – PHASE 2A](#)
- [SSAD Operational Design Assessment](#)
- [RDRS Standing Committee Findings Report](#)
- [RDRS Policy Alignment Analysis](#) and [Public Comment Summary](#)
- [Timeline for Urgent Requests and Public Comment Summary](#)

Given the work of the community over the course of the six years since the conclusion of the EPDP Phase 2 team's work, as well as the lessons learned, metrics captured, broader engagement efforts, and community discussion on RDRS, the Board believes the community has sufficient information to take a fresh look at the existing policy recommendations. In addition, the Board believes its action is in the best interests of ICANN and the community and will serve the global public interest by allowing the GNSO and broader ICANN community to align the various policies affecting requests for generic top-level domain (gTLD) nonpublic registration data, as outlined in the RDRS Policy Alignment Analysis. Accordingly, the recommendations, considered as a package, do not align with the lessons learned and key enhancements identified by the ICANN Board and ICANN community during the two-year RDRS pilot, as necessary for third party requests for nonpublic registration data, whether in general or through RDRS, and are not in the best interests of the ICANN Community or ICANN, as defined under the [ICANN Bylaws](#), Annex A, Section 9(d).

The Board looks forward to supplemental recommendations that align with the elements identified by the Board and community as important for a long-term solution for requesting access to gTLD nonpublic registration data. The Board expects the following four elements, as outlined in the RDRS Policy Alignment Analysis and GNSO Standing Committee's recommendations, to be incorporated into the planned Supplemental Recommendations to produce a long-term solution for requesting access to gTLD nonpublic registration data:

1. Mandatory registrar participation in mechanisms for requesting gTLD nonpublic registration data, which align with the presumption that consensus policies are binding on all contracted parties.
2. Confirmation of how the mechanism can be used to make and respond to requests for gTLD nonpublic registration data for underlying affiliated privacy/proxy domains.
3. Inclusion of service level agreements that require registrars to provide substantive responses to disclosure requests on an agreed timeline for urgent requests that are authenticated, as originally envisioned in the SSAD recommendations.
4. An authentication mechanism for law enforcement authorities and a phased approach for federated authentication for other user groups to facilitate urgent request responses, as originally envisioned in the SSAD recommendations.

This letter serves as the Board Statement, as defined under the ICANN Bylaws at Annex A-1, Section 6.b, articulating the reasons for the Board's determination. The resolution and rationale are available [here](#). As per the Bylaws requirements (Annex A-1, Section 6.c), "the Council shall review the Board Statement for discussion with the Board as soon as feasible after the Council's receipt of the Board Statement." The Board would like to suggest that this discussion be scheduled at the GNSO Council's earliest convenience with the relevant representative Board members.



I look forward to hearing from you to schedule a meeting between the GNSO Council and the ICANN Board to discuss this statement.

Sincerely,

A handwritten signature in black ink that reads "Tripti Sinha". The signature is written in a cursive style with a long horizontal stroke at the beginning.

Tripti Sinha
Chair, ICANN Board of Directors