RDRS SC Recommendations and Considerations to the GNSO Council

The RDRS SC aims to provide clarity on the expected next steps in relation to the EPDP Phase 2 SSAD Recommendations which could include (as per its Charter):

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 SC recognizes that its work under Assignment 4 involves providing input on the EPDP Phase 2 recommendations based on the operational experience and empirical data gathered and reviewed during the RDRS pilot. The SC's role in this context is advisory. These recommendations represent a collective reflection of the SC's observations, practical insights, and professional judgment, with a focus on enhancing understanding of how the aspects of EPDP Phase 2 recommendations have performed in the RDRS pilot environment. Lastly, for the avoidance of doubt, the SC serves in an advisory capacity to the Council and its recommendations are provided to assist the GNSO Council in its eventual dialogue with the ICANN Board and do not constitute policy development.

After studying the pilot's results and the various paths forward, the RDRS SC has formulated a set of recommendations to the GNSO Council. These recommendations aim to strike a balance between maintaining useful interim solutions and moving toward a more sustainable long-term approach/system.

RDRS SC Recommendations to GNSO Council

Recommendation 1: Continue the RDRS beyond the pilot period.

The SC recommends maintaining the RDRS pilot service and continuing to promote voluntary registrar participation beyond its initial two-year term until a long-term permanent solution or a successor system is agreed upon. Accordingly, the SC recommends that when the GNSO Council and ICANN Board engage in a dialogue, the Council should recommend that the RDRS pilot continue to operate while further GNSO policy work on a successor system is pending.

Recommendation Rationale:

The pilot has proven useful as a stopgap, providing value to users. The SC suggests that taking RDRS offline now would be premature; instead, the Council should ensure the tool remains available and consider improvements (as noted in Assignment 2). Keeping the RDRS running ensures there is no gap in service for legitimate requestors while the community deliberates on the EPDP Phase 2 Recommendations/SSAD. In sum, the SC's message is to preserve the progress made with RDRS and use it as a foundation, rather than discarding it. This continuity will benefit users who have come to

rely on the tool and will maintain momentum toward an access solution, even if SSAD as originally envisioned is delayed or altered.

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

While the RDRS pilot did not include the concept of authentication or accreditation, the SC recommends the RDRS or its successor system include authentication of specific user groups in order to be a viable system. In contrast to SSAD Recommendation #1, which contemplated accreditation for all requestors, the SC is not recommending mandatory accreditation or authentication of all requestors as the pilot functioned without an authentication feature. Instead, the SC recommends ICANN org explore authentication of specific user groups, beginning with law enforcement. ICANN org could begin by establishing technical and administrative standards for this requestor group in continued discussions with the Governmental Advisory Committee`s Public Working Safety Group (GAC PSWG) and other interested stakeholders. The SC also recommends that ICANN org continue discussing the possibility of authentication with other interested requestor constituencies.

Recommendation Rationale:

The SC discussed a middle ground approach such as implementing authentication in a layered or phased manner (rather than an all-at-once, all-user system); this approach would involve ICANN establishing standards for requestor groups to follow to be considered "Identity Providers" for their constituent members. Notably, this work could begin with law enforcement. The SC is aware of ongoing work by the Governmental Advisory Committee's Public Safety Working Group (GAC PSWG) to identify existing law enforcement authentication tools, and ICANN org has started discussions on whether and how those could be integrated into RDRS. The SC views this as a promising avenue. The SC also notes that if the community or GAC develops a new authentication scheme (for example, a centralized law enforcement authentication mechanism), integrating that into ICANN's processes might require additional policy work.

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

Based on the pilot's findings, the system has delivered sufficient utility to warrant continuation, but several system enhancements should be considered to ensure that the RDRS or the successor system remains sustainable and effective. **The below list is based on the key proposed system enhancements from Assignment 2 and is listed in order of priority.**

The SC understands that, with the exception of the ongoing discussions regarding an authentication mechanism referenced in Recommendation 2, ICANN org does not plan to add enhancements to the RDRS while further discussions between the GNSO Council and ICANN Board are ongoing. The SC further understands that the ICANN org could undertake suggested enhancements under the specific direction of the ICANN Board.

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

The SC recommends adding API (Application Programming Interface) integration for both registrars and requestors to enhance system interoperability and streamline data exchange between users and the RDRS. This could be considered without further policy work.

Recommendation Rationale:

An API would help enhance system interoperability and streamline data exchange between users and the RDRS. Note that API implementation may require ICANN to leverage existing systems and create new system integrations which will require more development requirements, as well as cost and resource estimates.

3.2 User Experience (UX) Redesign

The SC recommends that ICANN org engage a UX designer to improve the request forms in order to ensure the forms are simple and intuitive for requestors.

The SC further suggests removing the deprecated guidance text which suggests "In some cases, the domain name may have been registered through a privacy or proxy service, in which case, the RDRS may not be the right tool to request the nonpublic registration data."

Recommendation Rationale:

Simplified and intuitive forms could assist in reducing incomplete submissions from the requestors, which would improve the experience for both requestors as well as the registrars who receive the requests.

2.3. Optional ccTLD participation

The SC recommends allowing optional participation for ccTLD operators who use RDAP.

Recommendation Rationale:

User feedback and the number of requests that were not able to be processed further due to their reference to ccTLD indicate that this extension would be beneficial to the users. RDRS is currently only for ICANN-accredited registrars, while registries are not included. ccTLDs do not have contractual obligations with ICANN or standardized operational requirements, and therefore, there will be challenges with this implementation of this suggestion. There is also no central platform (like NSp - Naming Service Portal) that ccTLDs use that could be leveraged for processing requests.

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

4.1. Privacy/Proxy Data

The RDRS SC believes the process for and information provided concerning privacy/proxy data (P/P) in RDRS ought to be an area the GNSO Council should consider for further policy development;

however, the SC does not prescribe how this work should occur. The RDRS SC also notes that policy implementation work is currently ongoing for the accreditation of privacy and proxy providers, and the SC notes that any further policy work should not conflict with this work. For the avoidance of doubt, the recommendation to the GNSO Council to consider further policy work does not prevent registrars from voluntarily offering the disclosure of privacy or proxy data within the RDRS (or any successor system) if the registrar believes this is legally permissible.

Recommendation Rationale:

The RDRS SC agrees that there is currently no recommendation or requirement related to the disclosure of P/P data in SSAD/RDRS. The RDRS SC notes that some registrars who participate in RDRS voluntarily disclose this information, but this is not a requirement. While issues of P/P data were out of scope for EPDP Phase 2, SC members believe this should be in scope for further work on the SSAD. Based on the RDRS metrics review users noted that many requests for registration data submitted through RDRS return an outcome of "Publicly Available" or that registrars may not have access to the underlying data for privacy or proxy providers. This means the requestor has to submit another request outside of RDRS to potentially retrieve the underlying data. Integrating affiliated privacy providers into RDRS or any follow-up system could increase efficiency and user-satisfaction for all parties involved.

4.2. Inclusion of RDRS links in RDAP responses

The SC recommends for RDRS links (or of its successor system) to be included in RDAP responses to ensure discoverability across all registrar systems. Although the technical ability to include RDRS links in RDAP responses exists, updates to the RDAP profile would require a new policy recommendation.

Recommendation Rationale:

Whois and now RDAP follow clear specifications as per the Registry Agreements (RAs) and Registrar Accreditation Agreements (RAAs). While adding text to footers (as far as it makes sense in the case of RDAP) is currently possible; better visibility would be achieved directly in the redacted responses, which are contractually restricted. An alternative could be to suggest for these restrictions to be amended.

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

The SC recommends that the Council undertakes a targeted review of each EPDP Phase 2/SSAD Recommendations to determine suitability or warranty for future Policy Work. The SC recognizes the emphasis the EPDP Phase 2 Team placed on the recommendations being considered by both the GNSO Council and ICANN Board as a single, interdependent package. Accordingly, the SC recommends that the Board should consider the 18 recommendations together as one package. The SC further recommends that when the GNSO Council and ICANN Board engage in a dialogue, the Council should recommend that the ICANN board reject the SSAD recommendations (as a package) and send them back to the GNSO Council for further action and Supplemental Recommendation.

Recommendation Rationale:

The SC stops short of outright urging the Council to throw out certain recommendations, but it does encourage a willingness to consider modifying parts of the EPDP Phase 2 policy recommendations, if needed, as indicated in the below table. The SC considers it important to achieve a functional policy that adapts to the changed circumstances and benefits from the lessons learned of the RDRS pilot. The SC acknowledges that many of the EPDP Phase 2 recommendations were conceived and adopted by the GNSO Council as a comprehensive and interdependent package. While Assignment 4 entails assessing individual recommendations, the SC's intent is not to undermine the integrity of that package. The SC thinks that this report and the previous ODA report provide justification for rejecting the SSAD recommendations, and further note language in the SSAD report indicating the intent to treat the SSAD recommendations as a single package.

The SC has developed the table below evaluating each of the **18 SSAD policy recommendations** considering the RDRS pilot outcomes. It indicates whether each recommendation should be **kept** or **modified** along with rationale rooted in the pilot's evidence and the Standing Committee's considerations in Assignment 1 to 3.

EPDP Phase 2 Policy Recommendations	Proof of Concept expectations from GNSO Small Team	RDRS	Status in relation to EPDP Phase2 (SSAD) recommendation	Proposed Treatment of EPDP Phase 2 Recs	Estimated Level of Effort to modify Recommendation	Rationale
#1: Accreditation	Not relevant in the context of proof of concept	Not available		**Modify**	High	The SSAD plan to centrally accredit all users was not implemented in the RDRS pilot, which instead allowed submissions without formal accreditation. This greatly reduced complexity and cost, as ICANN's Operational Design Assessment identified the authentication system as a primary cost driver. The pilot still functioned without it, suggesting a full accreditation authority as foreseen originally may be unnecessary. Furthermore, SC members suggested clarifying the difference between

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						accreditation, authentication and authorization. SC agrees that some kind of accreditation might be worth having for a sustainable RDRS or successor system. However, the RDRS could also continue without accreditation. There may be an alternative "Minimum Viable Product" capable of satisfying 1.3.3, without the contemplated (and significant) cost.
#2: Accreditation of governmental entities	Not relevant in the context of proof of concept	Not available.	GAC (PSWG) is exploring options that may be bolted on to the front end of RDRS for Law Enforcement Agency accreditation.	**Modify**	High	The SC suggests that accreditation as described and envisioned in the SSAD/EPDP Phase 2 Recommendations might not be suitable anymore. RDRS did not include the envisioned Governmental Accreditation Authorities for law enforcement or other public authorities. The pilot showed no special handling for governmental users beyond self-identification. While the concept of authenticating government entities remains relevant, the SC suggests modifying this recommendation. For instance, it could leverage ongoing GAC/PSWG efforts to establish

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						trusted LEA credentials and focus accreditation on such high-need users rather than building a broad system for all government entities. This narrower approach reflects pilot realities (no dedicated gov portal was needed in practice) and would reduce implementation burden while still addressing the authentication gap for critical cases. SC agrees that authentication of law enforcement is needed.
#3: Criteria and Content of Requests	Request form would include the information outlined in this recommendation – not possible to submit if not all fields have been completed. It should be possible for a requestor to store their information so that it can be reused (as applicable) for future requests.	The request form includes the information outlined in Rec#3 except for those that relate to Rec#1. The system uses drop downs and pick lists where possible; it provides the ability for requestors to create request templates; it allows requestors to save drafts of requests in process; and it allows requestors to submit & duplicate, which provides requestors a rapid means of filing multiple,	Rec #3 requires that a request must include Identity and Signed Assertion information as defined in Recommendation #1, which is not available in the RDRS. 3.5 indicates that requests must be in English unless the CP accepts requests in other languages; the RDRS offers only English (no alternative languages)	**Keep**	Low	The pilot confirmed the importance of a standardized request format. This aligns directly with Recommendation 3's goal of allowing standardized submissions. The SC recommends keeping this requirement as is, since the pilot validated the benefit of a consistent, templated request system. However, SC members noted the lack of documentation certifying intellectual property (IP) rights as a barrier to request processing. SC noted, a "focus group" composed of requesters and

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		similar requests. In addition, the request form includes all the data elements listed in the recommendation.				responders may be formed to review request forms and make them user-friendly as requestors noted some issues with them.

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#4: Acknowledgement of receipt and relay of the disclosure request	Automated response to requestor once a form has been submitted, informing of proof of concept approach as well as confirming data processing / retention that will take place. ICANN org relays requests to sponsoring Registrar.	The Acknowledgement of Receipt appears in the history of pending or past requests. Additionally, the request is relayed to the registrar immediately upon successful submission.	Seems to broadly meet the policy recommendation. SSAD CGM is supposed to relay the disclosure request to the CP, while RDRS sends a notice via Naming Service portal and the request is relayed (provided) in the registrar's NSp account. RDRS includes Registrars but not Registries; Rec 4 includes expectation that Registry Operators will also be in SSAD. SSAD CGM is expected (§4.1.2.) to provide information about the subsequent steps, information on how public registration data can be obtained as well as the expected timeline consistent with the SLAs outlined in recommendation #10.; RDRS does not do this; there is no info about subsequent steps or how the public data can be	**Modify**	Medium	The SC suggests that this Rec may be modified. The Rec includes relaying the request to the registry, which does not happen in RDRS. Currently, Ry's do not participate in the RDRS, but they would have to in order to fully implement the recommendation. While the current system's (RDRS) functionality was deemed adequate, its limited ability to track status history (e.g., shifts from expedited to standard requests) was noted as a shortcoming. The SC recommended enhancing visibility and tracking features to strengthen transparency and operational clarity.

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			obtained, and there are no SLAs in RDRS.			

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#5: Response Requirements	Registrar is expected to provide a disclosure response without undue delay. Responses where disclosure of data (in whole or in part) has been denied should include a rationale sufficient for the Requestor to objectively understand the reasons for the decision. Disclosure response time as well as responses (data disclosed y/n, which fields, for which TLDs) to be tracked.	If the registrar denies or partially approves the request, pick lists and open text fields capture the rationale for the denial. If the registrar approves the request, pick lists capture the data fields being forwarded to the requestor. The system will not provide a means of alerting the data subject of a disclosure nor does it allow the data subject a mechanism to complain about the disclosure. Note that existing complaint channels remain open to data subjects should they choose to use them.	RDRS does not provide response recommendations to the registrar (as noted in Rec #5). The Standing Committee has indicated a need for registrars to provide more data or insight into disclosure decision responses for denials, specifically there is a request to require registrars to provide detailed information for each denial reason they select. This would necessitate changes to both the UI for requestors and registrars. In addition, this may necessitate creating a dynamic two-way communication system within RDRS. Expectation that SSAD will provide disclosure suggestion and CP must tell SSAD what the decision was if different so SSAD can learn.	**Modify**	Medium	To better align with user needs, this Recommendation should be adjusted to require more informative standardized responses. For example, registrars could be required to provide a clear reason for denial or request additional info if needed (rather than a generic refusal from the current dropdown menu in RDRS). The SC emphasized that some SSAD elements, particularly the Central Gateway Manager, have not been incorporated in RDRS. The limited range of rationale options for request rejection was considered inadequate, and concerns were raised about redirecting law enforcement users away from RDRS. The SC notes that a two-way communication feature in RDRS might be needed to improve communication pathways. Some SC members noted that Contracted Parties should conduct a *prima facie* review of a request's validity. If the request is insufficient for a substantive review, they should ask the

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			This is not reflected in RDRS. If we do consider building it in, we should also do a Data Protection Impact Assessment and Human RIghts Impact Assessment on any GenAI involved in that learning.			requestor for additional information before denying the request (noting that this functionality does not exist in the RDRS at this time). This would ensure that requestors have the opportunity to provide complete information for their requests and to learn what information requirements Contracted Parties may have.
#6: Priority Levels	As part of the request form, the requestor is able to indicate the priority level (with clear information to be provided what these priority levels include). A registrar may factor in this priority level in its assessment of the request. Proof of concept to	Requests may be categorized as standard or expedited. Expedited requests are flagged to the registrar, but there are no SLAs associated with the request, nor are registrars required to honor the request for an expedited timeline.	6.1 SSAD priority levels are not all represented in RDRS, and P1 is not quite the same. 6.2 has the option for requestors to prioritize consumer protection issues above other p3 requests.	**Modify**	High	The SSAD envisioned different priority tiers. The RDRS pilot did not implement an explicit priority system. RDRS only implemented "standard" or "expedited" requests, which does not address “urgent requests” as defined in EPDP Phase 1 Rec18. The SC suggests preserving the concept of priority levels but modifying

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	track use of priority levels.		RDRS does not have the option to suspend the ability for a user to make urgent requests, and no way for CPs to provide a dedicated contact to SSAD for Urgent requests or publish their business hours and timezone in SSAD.			its application. The SC highlighted that the existing priority classification (in SSAD) might have become outdated. The group suggests listing technical and policy prerequisites for handling "urgent requests" in RDRS.
#7: Requestor Purpose	Requestor to indicate as part of the request form the specific purpose for which disclosure is requested. Registrars are expected to review every request individually and respond to the requestor directly (with tracking of response time and whether or not data was disclosed and which fields)	The requestor purpose is a mandatory field within the request form, and asks the requestor to "Provide a brief description of the specific issue the request is attempting to resolve". The system also requires the requestor to identify the request type from a picklist that includes the purposes referenced in Rec. 7.1.1	See also, EPDP Recommendation #7.1.1. specifically lists investigations and enforcement of civil claims, including intellectual property infringement and cybersquatting as legitimate purposes for requesting disclosure of non-public registration data.	**Keep**	Low	The Committee views this feature as necessary and successful. Therefore, this recommendation could be kept unchanged. The current form requires specifying the purpose using GDPR-centric language, which some participants found confusing or misaligned with other legal frameworks. There was strong support for improving training and providing clearer guidance to requesters.

#8: Contracted Party Authorization	Registrars are expected to review every request individually and respond to the requestor directly (with tracking of response time and whether or not data was disclosed and which fields)	This recommendation is largely directed to the decision-making process of registrars, which the RDRS cannot address. However, the system will not allow bulk processing and limits registrars to responding to each request individually as per recommendation 8.1.	Rec #8 references accredited users, which are defined in Rec #1, and which is not implemented as part of the RDRS. Rec #8 assumes the existence of automated processing of disclosure decisions, which is not part of RDRS. Rec #8 refers to reexamination requests. In RDRS, if the request has already been closed by the registrar then the requestor would need to submit a new request with any additional details needed. Otherwise, if the request has **not** been closed, the registrar can communicate with the requestor (outside of the RDRS) to gather any additional information needed to complete their review.	**Keep**	Medium	The EPDP Phase 2/SSAD model places final decision-making authority with the contracted parties (registrars or registries) – a principle the RDRS pilot upheld. In RDRS, the system served as a routing mechanism, but each request was ultimately evaluated and either approved or denied by the registrar holding the data. This aligns with Recommendation 8's premise that contracted parties authorize the disclosure. The Committee advises keeping this recommendation: the registrar must remain the ultimate arbiter of disclosure. The SC notes that the recommendation includes re-examination requests which do not exist in RDRS and should be further considered (perhaps by updating RDRS to include such functionality).

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#9: Automation of SSAD Processing	Not relevant in the context of proof of concept	The RDRS includes functionality for EPDP Phase 2 Rec. 9.1, which requires the automated transmission of a well-formed request to the registrar of record. However, RDRS does not provide authentication.	Rec #9 references accredited users, which are defined in Rec #1, which is not reflected in the RDRS. Rec #9 expects transmission of the request to the registrar, while RDRS instead notifies the registrar that a request has been populated in the registrar's NSp account. The balance of the recommendation focuses on automation of disclosure decisions, which is not included in the RDRS.	**Modify**	Low	Recommendation 9 envisaged automating certain aspects of processing (and potentially even auto-disclosing data for some request categories under predefined conditions). The RDRS pilot, however, involved no automated disclosure decisions. Every request was handled manually by registrar staff. Given the volume of requests and the legal complexity, building out complex automation was not justified during the pilot. The SC suggests considering the scaling back of this recommendation. The pilot indicated that human review is still needed for each request, and introducing automation would add significant cost and complexity. The SC concluded that full automation is currently infeasible due to the need for nuanced human judgment in balancing privacy and disclosure rights. The SC further notes that automated transmission of the request to the registrar was not successfully implemented due to

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						technical limitations and would encourage consideration of alternatives (perhaps via a new API).
#10: Determining Variable SLAs for response times for SSAD	Registrars are encouraged to try to meet the SLAs set out in this recommendation. Tracking to be put in place to allow for confirmation of response times in combination with request type.	As there is no policy to regulate the Service Level Agreement (SLA), there are no SLAs set for the RDRS. Response time metrics are available in the RDRS Usage Metrics Report (Metric 16) for community review and deliberation.	The SSAD establishes target response times for different types of requests. Recommendation #10 outlines the Service Level Agreements (SLAs) for response times (between 3 and 10 business days for non-urgent requests). RDRS has no such timelines in place.	**Modify**	High	The SSAD recommendations set target Service Level Agreements (SLAs) for response times (with faster turnarounds for "urgent requests" as defined in EPDP Phase 1 Rec. 18)). In the pilot, no binding SLAs were in place. Participation was voluntary, and response times varied. The SC maintains that timely responses are important, but the pilot shows that enforcing uniform SLAs is difficult without a trusted requester authentication system, particularly for law enforcement.

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						Therefore, this recommendation should be modified. The SC suggests that some SLAs should be a component of RDRS/successor system but additional consideration should be given as to how to calculate and report on them in a balanced way. The SC also notes the work and discussion that is taking place on a timeline for "Urgent Requests".
#11: SSAD Terms and Conditions	SSAD proof of concept Terms and Conditions need to be clear for those parties involved.	For the requestors, RDRS Terms and Conditions will be presented to the requestor upon first login and acceptance captured by the system. The ability to print or download the Terms and Conditions will be offered. For registrars, the NSp Terms and Conditions will cover this additional functionality.	Rec #11 references an accreditation process as defined in Rec #1, which is not reflected in RDRS.	**Keep**	Low	The Standing Committee recommends keeping this as is. The existence of click-through terms in the pilot was an important legal and procedural measure, and it should remain in any future system to ensure requestors understand and agree to their responsibilities.

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#12: Disclosure Requirement	Registrars are expected to only disclose data requested by the requestor and only current data.	The registrars' expected behavior cannot be addressed in the system. The request form provides a pick list of data elements for the requestor to select (including ALL). This information is communicated with the rest of the request form to the registrar. Rights of erasure and notification are not provided by the system.	RDRS does not include functionality to fulfill 12.2.3 (data subject rights) or 12.2.4 (data subject disclosures)	**Keep**	Low	Not every aspect of Rec 12 was fully realized (e.g., registrars handle registrant notice and data processing agreements on their side). The Committee finds that the substance of this recommendation could be kept. The group addressed confusion around whether registrars could voluntarily share additional data beyond the request's scope. This raised concerns about potential over-disclosure. Members agreed that final recommendations must clearly delineate what is permitted to avoid misinterpretation and ensure consistency.
#13: Query Policy	Nice to have in the context of proof of concept	For the RDRS pilot, the system does not rate limit requestors.	RDRS includes some limited functionality for protection against abuse or misuse as described for SSAD. RDRS does not include the ability for a Requestor to submit multiple domain names in a single request. Rec 13 also refers to automated processing which is not available in RDRS.	**Keep**	Low	The SC suggests keeping this recommendation. Pilot findings suggest a couple of improvements to consider: for instance, the system could more gracefully handle misdirected submissions. SC members noted that high request volumes might be wrongly equated with abuse. The SC recommended more precise framing and exploration of allow-list/block-list mechanisms while

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						reviewing the recommendation text holistically.
#14: Financial Sustainability	Not relevant in the context of proof of concept	ICANN did not charge fees for RDRS users and absorbed costs for development and operations via its Supplemental Fund for the Implementation of Community Recommendations.	Rec #14 includes expectations in relation to financial sustainability of the SSAD, and states that "Requestors of the SSAD data should primarily bear the costs of maintaining this system". The RDRS is operated with no charge to any requestors.	**Modify**	Low	To be clear, the Committee is not recommending changing the source of funding. Recommendation #14.2 stated "*The objective is that the SSAD is financially self-sufficient without causing any additional fees for registrants. Data subjects MUST NOT bear the costs for having data disclosed to third parties; Requestors of the SSAD data should primarily bear the costs of maintaining this system.*" *The Standing Committee notes that Recommendation 14 should only be modified under Section 14.5. The Standing Committee notes that the considerations in Recommendation 14.5 relating to the accreditation framework may need to be adjusted depending on*

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						specifics determined by the accreditation provider. For example, public safety agencies may choose to waive fees for their constituent members *The Committee suggests exploration of a leaner and more cost-effective disclosure system than that contemplated by the SSAD Operational Design Assessment (ODA) . In particular, the SC notes a primary cost-driver of the SSAD pertained to the expense of requestor authentication; exploration of alternative models of authentication may significantly reduce contemplated costs. E.g., ICANN Org might set technical and policy standards for requestor groups to use in issuing requests (in effect, allowing requestor constituencies to act as Identity Providers for their constituents), as is being discussed by ICANN Org and the GAC PSWG; in such a model, requestor groups would be taking on the the burden of authentication - the most significant cost of maintaining the system.*

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#15: Logging	Appropriate logging needs to be put in place so that data resulting from the proof of concept can be reviewed and analyzed. This data must be anonymized and not include any personal information.	The system logs and reports on the data elements outlined in Section 3.7, Logging, Reporting, and Service Level Targets, of the WHOIS Disclosure System Design Paper. The RDRS logs the relevant data elements, many of which are included in ICANN org's monthly usage reports.	Rec #15 includes logging requirements for accreditation authority and Identity Provider, which are defined in Rec #1, and which is not included in the RDRS. Rec #15 also includes logging requirements for "divergence between the disclosure and non-disclosure decisions of a CP and the recommendations of the Central Gateway." which assumes that the SSAD provides disclosure recommendations (which the RDRS does not do)	**Modify**	Low	This recommendation could be modified. The RDRS experience showed that while the RDRS logs some data, it currently lacks user-level logs. The SC noted the need to distinguish logging purposes, whether for accountability, statistics, debugging, or transparency to support future system refinements. However, this recommendation also outlines logging requirements for entities that do not exist (accreditation authority, central gateway manager).

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#16: Audits	Not relevant in the context of proof of concept	Not available.	Rec #16 includes audit requirements for Accreditation Authority, Identity Providers and Accredited entities/individuals, which are defined in Rec #1, and which is not included in the RDRS.	**Keep**	Low	The EPDP Phase 2/SSAD policy included audit requirements to ensure the system and its users operate correctly. For example, auditing accredited requestors for misuse or auditing registrar compliance with disclosure obligations. The RDRS pilot did not incorporate formal audits of requests or outcomes (given its proof-of-concept nature and voluntary participation). However, pilot findings point to the value of having an audit mechanism in a permanent system. There were concerns during the pilot about potential misuse or non-cooperation. An audit function (as envisaged by Rec 16) would allow ICANN org or the SC to periodically review samples of cases, verify that policies are followed, and address any systemic issues. The SC suggests keeping this requirement so that any future system can be monitored and improved through regular audits of both requestor and contracted-party actions.

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#17: Reporting Requirements	Note, the small team considered whether accreditation should be part of the necessary category, but feedback from the RrSG representatives indicated that in the context of a proof of concept approach, Registrars would, regardless of whether accreditation would be in place, confirm requestor provided information themselves and not rely on the information provided by an unknown third party accreditor in the context of a proof of concept.	During the pilot period, ICANN org has produced monthly usage reports based on metrics agreed upon with the Standing Committee. The PDF report is accompanied with CSV files to allow for readers to further analyze the data.	Reporting may continue in current form or with adjustments as agreed with the SC and the ICANN community. Some of the envisioned reporting items (e.g. "• Number of disclosure requests automated; • Information about financial sustainability of SSAD;") are not available in RDRS and so are not included in current reporting	**Keep**	Low	The Committee suggests keeping it unchanged. The pilot has shown that such reports are feasible to produce and extremely useful for data-driven evaluations and future policy adjustments. The current RDRS reporting was considered helpful, but there was a call for more metrics, especially those that enhance requester accountability and system transparency.

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#18: Review of implementation of policy recommendations concerning SSAD using a GNSO Standing Committee	Not relevant in the context of proof of concept	ICANN org has worked with the Standing Committee on the implementation of the pilot RDRS.	The GNSO Council may consider how to repurpose the existing Standing Committee to fulfill this recommendation.	**Keep**	Low	This recommendation proposed a Standing Committee to oversee SSAD operations and improvements, a concept of this Recommendation directly tested by the RDRS Standing Committee during the pilot. The SC's work over the pilot's duration (monitoring usage, flagging issues, and considering adjustments) demonstrates the value of having a dedicated body continuously evaluating the system. The pilot findings and trends were compiled and interpreted by the SC, fulfilling the intent of Rec 18. In the SC`s view, this mechanism should be kept in place. Having an ongoing Standing Committee (or similar oversight team) will be crucial for any next steps – whether that means refining the SSAD requirements or transitioning the RDRS into a more permanent service. The existing SC was found to be functioning effectively, though it differs from the SSAD's envisioned permanent oversight model. It was agreed that the current committee structure should be retained with a view toward evolving it into a long-

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						term governance mechanism.

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

The RDRS SC recommends maintaining the current Standing Committee with a narrowed scope in advising ICANN on the continued operation, maintenance and potential enhancement of the RDRS while it continues to be in operation.

Recommendation Rationale:

The primary purpose of the SC has been to consider the lessons learned from the RDRS pilot and provide recommendations to the GNSO Council on what to do next. The SC also served in an advisory capacity to ICANN org on proposed enhancements to the RDRS. Taking into consideration that this report is recommending that (1) the RDRS continue to operate at least until a successor system is in place and (2) that ICANN undertake enhancements to the RDRS in several areas, the SC recommends that the GNSO Council consider maintaining the current RDRS SC to serve in an advisory role to the GNSO Council and/or ICANN org where necessary.