



# Registration Data Policy Implementation Review Team Urgent Request Timeline

Meeting #6

01 October 2025

# Agenda

- Administrative Update
- Proposed Next Steps and Timeline
- Urgent Request Timeline
- General Reminder regarding Urgent Requests
- Review of IRT feedback received and suggested edits to proposed language

# Proposed Next Steps & Timeline

## Next Steps and Public Comment Timeline

Oct 1	2nd IRT 90 minute session. Final session on Urgent Request language unless new ideas discussed on call.
Oct 3	ICANN org circulates “last call” final draft language based on IRT discussion.
Oct 10	Deadline for IRT Feedback.
Oct 15 - Dec 12 or Oct 22 - Dec 15	Public Comment period on Urgent Request language.
Dec 12 - Dec 22 or Dec 15 - Jan 9 2026	ICANN org review public comments received; determine if additional IRT discussions are needed.
Jan 12 - 23 2026	ICANN org public comment report

# Urgent Requests Timeline



**28 July  
2023**

IRT does not align on compromise proposed: Response to Urgent Request within 24 hours, can be extended by 2 business days, plus 1 additional business day for complex requests.



**23 Aug  
2023**

GAC sends letter to ICANN Board advocating for Board review of compromise proposal.



**08 Sep  
2023**

Registrar Stakeholder Group writes to Board, supporting compromise proposal.



**11 Feb  
2024**

ICANN Board responds to GAC, RrSG: Compromise proposal should be reviewed



**03 June  
2024**

ICANN Board to GNSO: Responses measured in business days may not be appropriate for truly urgent requests and needs to be revisited.



**29 Aug  
2024**

GNSO Council to Board: responses measured in business days may not be appropriate for truly urgent requests.



**12 Feb  
2025**

GAC/Board/GNSO meet, agree timeline issue should return to IRT, with authentication mechanism discussed in parallel.



**23 Apr  
2025**

ICANN org begins discussions with Registration Data IRT on the urgent request timeline.

# General Reminder for IRT Regarding Urgent Requests

- After significant review of the policy recommendation, [the Board identified](#) that the previously proposed 2023 Urgent Request policy language, which would have required Urgent Requests to be responded to within a maximum of three business days, **is not fit for purpose and must be revisited**, specifically:
  - To the extent that law enforcement needs registration data to respond to situations that pose an imminent threat to life, serious bodily harm, infrastructure, or child exploitation, the **proposed timeline - whether one, two, or three business days - does not appear to be fit for purpose**. To respond to truly imminent threats, a **much shorter response timeline, i.e., minutes or hours rather than days, would seem to be more appropriate**.

# General Reminder for IRT Regarding Urgent Requests (cont'd)

- The GAC and GNSO Council indicated the same, namely, that the use of business days does not seem appropriate to respond to Urgent Requests for the disclosure of data.
  - [GNSO Council](#) - in agreement with the concerns raised (by the Board), noted that a **response measured in business days may not be appropriate for truly urgent requests** for disclosure of data.
  - [GAC](#) - **three business days** (which could stretch to seven calendar days depending on weekends and intervening holidays) **is not a reasonable time period for responding to** urgent requests. This is especially true because **“urgent” requests** apply only to emergency situations **involving imminent threats to life and critical infrastructure, among other things.**
- Furthermore, all three parties indicated that an authoritative, legally sufficient cross-border system for validating law enforcement requestors is necessary to provide a shorter response time.
  - Work on authentication is underway within the PSWG, with the understanding that the new Urgent Request timeline would apply to requests from entities authenticated through this new, to-be-agreed mechanism.