

Draft FAQs: PICDRP

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1. Scope of PICDRP

1.1 What is the PICDRP?

The Public Interest Commitments Dispute Resolution Procedure (PICDRP) is a dispute resolution procedure applicable to commitments included in Specification 11 of the Registry Agreement. It applies in circumstances in which a [registry operator](#) is alleged to have breached any of its commitments in Specification 11.

1.2 What are the commitments included in Specification 11 of the Registry Agreement?

The commitments contained in Specification 11 of the Registry Agreement are called public interest commitments. These commitments are binding and subject to the PICDRP. These commitments are incorporated into Registry Agreements via the application evaluation and contract execution processes.

Specification 11 includes three types of public interest commitments:

- Mandatory Public Interest Commitments
- Safeguard Public Interest Commitments
- Registry Voluntary Commitments (referred to as “specific voluntary public interest commitments” in Specification 11, to ensure alignment in terminology with the PICDRP)

Specification 11 commitments were created by ICANN in response to the Governmental Advisory Committee concerns voiced in the 2012 Round of the New gTLD Program. Their concerns involved issues such as consumer protection; regulated market sectors such as financial, health and charities; intellectual property issues; and the relationship between new gTLDs and applicable legislation.

In order to hold registry operators accountable for protecting the public interest, Registry Agreements executed as a result of the 2012 Round included Mandatory and Safeguard Public Interest Commitments, as well as customized public interest commitments agreed to by applicants, which were referred to as “Voluntary PICs.”

In the 2026 Round of the New gTLD Program, as result of additional ICANN policy development in this area, customized registry commitments included in Specification 11 of the Registry Agreement are now referred to as specific voluntary public interest commitments. These commitments are referred to as Registry Voluntary Commitments during the 2026 Round gTLD application process, but are labeled as “specific voluntary public interest commitments” in Specification 11 to ensure consistency with the terminology used in the PICDRP.

RVCs, like the Voluntary Public Interest Commitments from the 2012 Round of the New gTLD Program, are generally customized to the relevant Registry Agreement. During the New gTLD

Program application process, applicants are permitted to propose Registry Voluntary Commitments for evaluation by ICANN in order to address concerns with their applied-for gTLD strings that may not be remedied by public interest commitments or resolved via other means. Proposed Registry Voluntary Commitments will only be approved if the applicant and ICANN each agree that the proposed commitment, if included in the applicable Registry Agreement, would be enforceable under the ICANN Bylaws and as a practicable matter. [Learn more](#)

1.3 Who can use the PICDRP?

Any person or entity (“[Reporter](#)”) that believes they have been harmed as a result of a [registry operator](#)’s non-compliance with its Specification 11 commitments may file a [Public Interest Commitment report \(PIC report\)](#) with ICANN. ICANN will make a determination as to whether the Reporter is in good standing and is not a [repeat offender](#), whose future reporting would be excluded by ICANN.

1.4 What are examples of harms that may be actionable under the PICDRP?

One example of demonstrated harm could be a registry operator’s lack of transparency (to registrants, Internet users, or the general public) despite its commitment to establish, adhere to, and publish clear registration policies. Another example could be the failure of the registry operator to periodically assess whether domains within the gTLD are being used for Domain Name System Abuse. These examples are not exclusive and other circumstances may exist that demonstrate that someone has been harmed as a result of a registry operator’s non-compliance with its Registry Agreement commitments.

1.5 Can PICDRP be used to address a ‘foreseeable harm’ to someone as a result of a registry operator’s non-compliance?

The PICDRP does not provide a means to challenge or act to prevent harms that may occur in the future. When filing a PICDRP complaint, the [Reporter](#) must demonstrate evidence of actual harm. In the evidence provided to ICANN, the Reporter must document which of the relevant public interest commitments or Registry Voluntary Commitments are being reported as non-compliant, including reasoning why the Reporter believes they have been harmed by the registry operator’s alleged non-compliance.

1.6 What benefit does the PICDRP provide?

The PICDRP could provide a more cost-effective path to seeking redress in the event a registry operator is not complying with its public interest commitments or Registry Voluntary Commitments, as compared to pursuing litigation, for example. The PICDRP also provides an international scope, allowing the resolution of disputes regardless of where the [Reporter](#) and registry operator are located.

1.7 Can the PICDRP be used to bring a case against an entity that manages a Country Code Top-Level Domain?

No. The PICDRP does not apply to [ccTLDs](#). Public interest commitments are obligations of generic top-level domain ([gTLD](#)) registry operators that are included in the Registry Agreement between the registry operator and ICANN. The operators of country code top-level domains do not execute Registry Agreements with ICANN.

1.8 Can the PICDRP be used to bring a case against a registrar?

No, the PICDRP is used for cases regarding registry operators that may not be complying with the public interest commitments in Specification 11 of their Registry Agreement.

2. PICDRP Adjudication Process Overview

2.1 What are the various stages of the PICDRP?

The PICDRP has seven stages:

Stage 1 - Public Interest Commitment report submission: The [Reporter](#) submits the [Public Interest Commitment report \(PIC report\)](#), stating the registry operator's alleged non-compliance with one or more of its commitments in Specification 11 of its Registry Agreement, as well as how the Reporter has been harmed by the alleged non-compliance.

Stage 2 - Initial review: ICANN will perform a formal review to ensure that the Reporter is in good standing, and determine whether the Reporter has (i) identified the proper parties; (ii) identified at least one Public Interest Commitment with which the registry operator failed to comply; (iii) alleged how the Reporter has been harmed; and (iv) set forth the grounds of the claim and submitted appropriate documentation to support the report of non-compliance.

Stage 3 - Notice to registry operator: If the report passes the initial review, ICANN will send the Public Interest Commitment report to the registry operator who will then have 30 calendar days to conduct a conference with the Reporter, if the registry operator wishes to do so. The Reporter must participate in the conference if it is conducted.

Stage 4 - Decision on referral to PICDRP Panel: If the registry operator and the Reporter are not able to resolve the issue during the 30-day conference period, ICANN will determine if the Public Interest Commitment report should be investigated by ICANN Contractual Compliance or forwarded to a [panel of experts](#) outside of, but appointed by, ICANN to evaluate the registry operator's compliance with its obligations under Specification 11. Regardless of whether the Public Interest Commitment report is investigated by ICANN Contractual Compliance or the [PICDRP panel](#), the evaluation assesses the registry operator's compliance with the same contractual provisions.

Stage 5 - ICANN Contractual Compliance investigation (where applicable): If ICANN decides to conduct a Contractual Compliance investigation into the merits of the allegations in the Public Interest Commitment report and this investigation demonstrates the registry operator's non-compliance, ICANN may issue a formal enforcement notice providing the registry operator with 30 calendar days to resolve the non-compliance. If the breach is not resolved within 30 days, the registry operator can be terminated. If ICANN's Contractual Compliance investigation finds that the registry operator is in compliance, ICANN will close the PICDRP case and inform the parties.

Stage 6 - PICDRP Panel determination (where applicable): If ICANN decides to invoke a panel to investigate the allegations in the Public Interest Commitment report and the panel finds the registry operator is not in compliance with its public interest commitments, ICANN will notify the registry operator through a formal enforcement notice providing the registry operator with 30 calendar days to resolve the non-compliance. If the breach is not resolved within 30 days, the registry operator can be terminated.

Stage 7 - Remediation (where applicable): If the registry operator does not resolve any identified non-compliance within the 30-day deadline, ICANN will continue its enforcement process. Should the registry operator object, it may avail itself of the mechanisms that exist to resolve disputes between ICANN and the registry operator that are in the Registry Agreement.

2.2 How long does the PICDRP take from start to finish?

The time between the initial submission of the [Public Interest Commitment report \(PIC report\)](#) and the resolution can vary on a case-by-case basis. In [previous cases](#) in which a [PICDRP panel](#) was invoked, panels issued a decision in five months or less from the date the Public Interest Commitment report was first submitted.

2.3 Is there any cost associated with the PICDRP for the Reporter and the registry operator?

If the panel is invoked, the panel is paid for by ICANN. There is no fee for filing the [Public Interest Commitment report \(PIC report\)](#), and no cost is incurred for the registry operator or [Reporter](#) throughout the procedure.

2.4 Is the PICDRP confidential?

ICANN will share the information and evidence provided by the [Reporter](#) with the registry operator and the panel, if invoked. Decisions issued by [PICDRP panels](#) are published at <https://www.icann.org/picdrp-en> and formal enforcement notices issued by ICANN Contractual Compliance following a determination of non-compliance with public interest commitments are published at <https://www.icann.org/compliance/notices>. The details of cases that are resolved without invoking a PICDRP panel and cases investigated by ICANN that do not result in a determination of non-compliance are not published.

2.5 In what language is the PICDRP conducted?

The PICDRP is conducted in English.

2.6 Are in-person hearings required during PICDRP?

There will be no in-person hearing. The relevant information will be provided to the parties involved electronically.

2.7 Can the Reporter and registry operator resolve the issue on their own?

Yes, if the [Public Interest Commitment report \(PIC report\)](#) passes ICANN's initial review, the registry operator and the [Reporter](#) will have a 30 day conferencing period to resolve the issue. If the Reporter and the registry operator are able to resolve the dispute during the conference, the registry operator must notify ICANN and provide ICANN (with a copy to the Reporter) with appropriate evidence that the matter has been resolved. The Reporter's failure to participate in the requested conference may result in ICANN's closure of the Public Interest Commitment report, and both parties will be notified by ICANN. If the issue(s) are not resolved during the 30 day conferencing period, the Reporter shall notify ICANN.

In addition, If the Reporter and registry operator come to an agreement over their dispute during any stage of the proceeding, the registry operator shall inform ICANN and shall provide ICANN (with copy to the Reporter) with appropriate evidence that the matter has been resolved.

2.8 Does ICANN audit the registry operator's compliance records?

The PICDRP specifies that ICANN may audit registry operators' records which must be retained per the PICDRP. ICANN performs a variety of regular audits, targeted audits, as well as broader audits of various requirements. The registry operator is required to maintain their records for three (3) years from the date the alleged non-compliance was reported, unless a shorter period is required by law or is approved by ICANN.

3. Roles of Parties Involved in the PICDRP

3.1 Who are the parties involved in the PICDRP?

There are four main parties involved in the PICDRP:

- 1) The [Reporter](#);
- 2) The [registry operator](#);
- 3) [ICANN](#) (specifically its Contractual Compliance team); and
- 4) The [PICDRP panel](#) (when one is invoked).

3.2 What is the role of the Reporter in the PICDRP?

The Reporter is any person or entity that believes they have been harmed because a registry operator did not comply with its commitments in Specification 11 of the Registry Agreement.

The Reporter:

- Submits a [Public Interest Commitment report \(PIC report\)](#) to ICANN using an online form
- Identifies which public interest commitments were allegedly violated by the registry operator
- Explains how they were harmed
- Provides supporting evidence
- Participates in a 30-day conference with the registry operator if requested
- Responds to ICANN requests for additional information, if needed

[Learn more](#)

3.3 What is the role of the registry operator in the PICDRP?

The registry operator is the organization that manages a generic top-level domain (gTLD) and has agreed to comply with the commitments included in Specification 11 of its Registry Agreement with ICANN.

The registry operator:

- Designates a compliance contact to receive the [Public Interest Commitment report \(PIC report\)](#) and PICDRP-related communications from ICANN
- Maintains records and reports related to any alleged non-compliance with its Specification 11 commitments
- Has the opportunity to resolve the issue with the [Reporter](#) during a 30-day conferencing period
- Explains to ICANN why it believes it is complying with its commitments
- Cooperates with ICANN or a [PICDRP panel](#) by providing information and records
- Addresses any confirmed non-compliance within the required timeframe

If a registry operator does not resolve confirmed issues, ICANN may take enforcement action under the Registry Agreement. [Learn more](#)

3.4 What is the role of ICANN in the PICDRP?

ICANN manages and oversees the entire PICDRP process. Specifically, its Contractual Compliance team investigates whether registry operators are meeting their contractual obligations. Note that not every PICDRP case is investigated by Contractual Compliance – some are investigated by a [PICDRP panel](#) instead.

ICANN:

- Reviews [Public Interest Commitment reports \(PIC reports\)](#) to ensure they meet basic requirements
- Determines whether the [Reporter](#) is in good standing
- Sends valid reports to the registry operator
- Decides whether to investigate the issue itself or appoint a [PICDRP panel](#)
- Conducts Contractual Compliance investigations and enforces within its scope, when appropriate
- Reviews evidence from the [Reporter](#) and the registry operator
- Requests additional information when needed
- Publishes PICDRP panel decisions when applicable
- Issues enforcement notices if non-compliance is found

- Determines remedies and enforces the Registry Agreement

3.5 What is the role of the PICDRP Panel?

A PICDRP panel is an independent group of three experts appointed by ICANN when a case is referred for investigation of the allegations in the [Public Interest Commitment report \(PIC report\)](#).

The PICDRP panel:

- Reviews the Public Interest Commitment report, evidence, and registry operator responses
- Evaluates whether the registry operator complied with its Specification 11 commitments
- Does not communicate directly with the [Reporter](#) or the registry operator
- Issues findings to ICANN, not directly to the parties

A PICDRP panel may not be required for all compliance investigations.

4. Public Interest Commitment Report (PIC Report)

4.1 Where to submit the Public Interest Commitment report?

The [Reporter](#) must submit the Public Interest Commitment report through ICANN's dedicated [webform](#). The form lists all information and records that are required from the Reporter.

4.2 What information must be included in the Public Interest Commitment report?

The [Reporter](#) must specifically identify which public interest commitments form the basis for the PIC report and state the grounds of the alleged non-compliance with one or more public interest commitments and include supporting documentation. The Reporter must state how it has been harmed by the non-compliance, describe the relevant events, and provide copies of all relevant communications and available evidence regarding the report. Additionally, the Reporter will be asked to agree to participate in a conference if the registry operator requests to confer with the Reporter.

4.3 Can a Public Interest Commitment report include more than one registry operator?

As there are specific questions to be answered with respect to the events that occurred involving the [Reporter](#) and the registry operator, there should be one PIC report submitted per registry operator.

4.4 Does the Public Interest Commitment report have to be prepared and submitted by a lawyer?

There is no requirement that the PIC report be prepared or submitted by a lawyer.

4.5 Does the Public Interest Commitment report have to be certified or notarized?

No, it is not required or expected to have the PIC report certified or notarized.

4.6 Is the Reporter required to send a copy of the Public Interest Commitment report to the concerned registry operator?

No, the [Reporter](#) is not expected to send a copy of the report to the registry operator. If the PIC report passes ICANN's preliminary review, ICANN forwards the Public Interest Commitment report and any of the Reporter's supporting documentation to the registry operator through its compliance contact.

4.7 What happens if the Public Interest Commitment report is incomplete?

If the PIC report is incomplete, ICANN may request additional information from the [Reporter](#) or close the case with no further action.

5. ICANN's Compliance Investigation

5.1 What triggers a compliance investigation by ICANN?

If the [Reporter](#) and registry operator fail to resolve the issue(s) during the conferencing period, ICANN is notified by the Reporter. Within 10 business days of the notification, ICANN will require the registry operator to explain why it believes that it is in compliance with its public interest commitments and the basis for that belief. The registry operator will then have 10 business days to respond. Based on the [Public Interest Commitment report \(PIC report\)](#) and the registry operator's response, ICANN will determine whether a compliance investigation by ICANN is appropriate or whether a panel should be invoked instead.

5.2 On which basis will ICANN decide whether to conduct its own investigation or invoke a PICDRP panel to review the registry operator's compliance?

This decision is determined on a case-by-case basis and may depend on the complexity of the alleged violation(s), the potential impact on the community, the size of the registry operator, the public interest commitments at issue in the complaint, the relevance of the allegations to ICANN's mission to ensure the stable and secure operation of the Internet's unique identifier systems, and other factors that may be raised by the [Public Interest Commitment report \(PIC report\)](#) or registry operator's responses, as applicable. Regardless of whether the complaint is investigated by ICANN or the panel, the evaluation considers the registry operator's compliance with the same contractual provisions.

5.3 What is expected of the registry operator during ICANN's compliance investigation?

During ICANN's compliance investigation, the registry operator is required to timely and fully respond to all requests from ICANN with the information and records needed from the registry operator to demonstrate compliance with the applicable public interest commitments with respect to the specific case. Its failure to provide requested information could result in additional compliance action, per the applicable ICANN Contractual Compliance processes, including issuance of breach notices and termination of the Registry Agreement (meaning the registry operator would no longer be able to operate the gTLD).

5.5 What is expected of the Reporter during ICANN's compliance investigation?

During ICANN's compliance investigation, the [Reporter](#) is expected to timely and fully respond to any additional request for information and records from ICANN.

5.6 How will the parties know whether ICANN has reached a determination and the outcome of the investigation?

ICANN will communicate the outcome of its investigation and the basis for any determination reached to the [Reporter](#) and the registry operator in writing.

6. PICDRP Panel

6.1 Who are the PICDRP panelists?

The [persons](#) appearing on the PICDRP panel have been selected on the basis of their well-established reputation for their impartiality, sound judgment and experience as decision-makers, as well as their substantive experience in the areas of public policy, international dispute resolution, contract interpretation, Domain Name System technical experience, as well as legal knowledge.

6.2 When is the PICDRP panel appointed?

After ICANN receives the [Public Interest Commitment report \(PIC report\)](#), ICANN determines whether the response from the registry operator demonstrates compliance with its Registry Agreement obligations. ICANN will then determine if the PIC report should be investigated by ICANN Contractual Compliance or forwarded to a panel of experts. If ICANN appoints the panel, the registry operator must cooperate by providing requested information within 10 business days of ICANN's request. The panel is appointed by ICANN at ICANN's expense.

6.3 What does the PICDRP panel consider during its evaluation?

The panel considers the relevant public interest commitments and the [Public Interest Commitment report \(PIC report\)](#) (including the [Reporter](#)'s documentation and any registry operator responses or explanations provided to ICANN under Section 3.2 of the PICDRP).

6.4 Is there opportunity for additional evidence or hearings during the PICDRP panel's evaluation?

In general, additional evidence is not considered, and there are no hearings during the panel's evaluation. However in exceptional circumstances, there can be opportunity for additional evidence or hearings.

6.5 How long does the PICDRP panel have to conduct its evaluation?

The panel has 15 calendar days to conduct its evaluation once appointed by ICANN.

6.6 Is there a communication channel between the PICDRP panel and the Reporter or the registry operator?

The panel has no direct communication with the registry operator or [Reporter](#). The panel reports evaluation results to ICANN. ICANN provides evaluation results to the registry operator and Reporter.

6.7 What happens if the PICDRP panel finds the registry operator in compliance?

If the panel finds the registry operator in compliance, ICANN closes the report and sends a closure email to both the [Reporter](#) and registry operator.

6.8 What happens if the PICDRP panel finds the registry operator is not in compliance?

If the panel finds the registry operator is not in compliance with its public interest commitments, ICANN notifies the registry operator with a formal enforcement notice, and the registry operator is given 30 calendar days to resolve the non-compliance.

7. ICANN's Determination Following the Compliance Investigation

7.1 What enforcement determination can ICANN make following the completion of the compliance investigation?

Following the completion of the compliance investigation, ICANN can make one of two enforcement determinations.

- a) If the registry operator is found to be not in compliance, ICANN determines the appropriate disciplinary action and continues the enforcement process.
- b) If the registry operator is found to be in compliance, ICANN closes the case and notifies both the registry operator and [Reporter](#).

7.2 Is there opportunity for input from the Reporter or the panel before ICANN makes a determination?

Communications between the panel and the [Reporter](#) or registry operator are prohibited during the evaluation process. Any post-report communication between the registry operator and Reporter may be reviewed at the discretion of the panel, upon request. The panel then reports its evaluation results to ICANN, which ICANN provides to the registry operator and Reporter.

7.3 How does ICANN communicate its determination?

ICANN notifies the registry operator and [Reporter](#) of its determination electronically via email.

7.4 How is the determination implemented?

Registry operators must agree to be bound by any determination by ICANN, and to implement and adhere to any remedies contained in the Registry Agreement for non-compliance of such commitment(s) subsequently imposed by ICANN. ICANN will impose the remedies contained in the Registry Agreement following the conclusion of the compliance investigation.

7.5 What happens if the registry operator disagrees with ICANN's determination?

If the registry operator objects to the enforcement determination, it can use the dispute resolution mechanisms in Articles 4 and 5 of the Registry Agreement.

7.6 Are the determinations available to the public?

The outcomes of the determinations are published after the case is closed. The [determination page](#) will contain the panel report date, registry operator name, gTLD string, panel evaluation results, and a PDF of the panel report. A [link](#) to all Contractual Compliance enforcement notices and the status of non-compliance findings will be on the determination page as well.

8. Repeat Offenders

8.1 What is a repeat offender in the context of PICDRP?

In the context of PICDRP, a repeat offender can be a [Reporter](#) or registry operator. If the Reporter is a repeat offender, they could have a history of fabricating reports against registry operators. If the registry operator is a repeat offender, they could have a pattern of non-compliance with public interest commitments.

8.2 How does ICANN determine if a registry operator is a repeat offender?

ICANN will review the [Public Interest Commitment report \(PIC report\)](#) and records from the last three years to determine if a registry operator is a repeat offender.

Factors relevant to the determination of a registry operator as a repeat offender include, but are not limited to:

- a) the severity of any previous public interest commitment allegations/claims against the registry operator;
- b) the number of public interest commitment complaints relative to their existing TLD registrations; and
- c) whether there is a pattern of non-compliance with the public interest commitments.

8.3 How does ICANN determine if a Reporter is a repeat offender?

ICANN reviews records from the last three years to determine if a [Reporter](#), who filed the [Public Interest Commitment report \(PIC report\)](#), is a repeat offender.

Factors relevant to the determination of a Reporter as a repeat offender include, but are not limited to:

- a) the number of PIC reports filed by the Reporter which were resolved in favor of the registry operator;
- b) the number of times a PIC report was closed because of a Reporter's failure to meet and confer with a registry operator during the Conferencing Period;
- c) the number of times the Reporter filed a PIC report that did not state a claim of non-compliance of public interest commitments; and
- d) whether the Reporter has exhibited a pattern or practice of filing reports that have not passed ICANN's initial review.

8.4 When does ICANN make the determination of a repeat offender?

Typically, ICANN will identify and determine a repeat offender in the initial review of the [Public Interest Commitment report \(PIC report\)](#). However, ICANN can make the determination of a repeat offender at any time during the PICDRP.

8.5 What actions can ICANN take against a repeat offender?

ICANN may impose financial penalties against any registry operator that is found to be a repeat offender. ICANN excludes future reporting from any [Reporter](#) that is found to be a repeat offender.

9. Resource Materials

9.1 Where to get additional information about PICDRP?

Additional information about PICDRP can be found [here](#).

9.2 Where to get additional information about other types of dispute resolution procedures?

Additional information about other types of dispute resolution procedures regarding registry operator behavior, such as the Registration Restrictions Dispute Resolution Procedure (RRDRP) and the Trademark Post-Delegation Dispute Resolution Procedure (PDDRP), can be found [here](#).