

Registries Stakeholder Group Statement



Registration Data Request Service (RDRS) Policy Alignment Analysis

Date statement submitted: 15 December 2025

(this is a copy of the comment submitted via the ICANN public comment platform)

Reference url:

<https://www.icann.org/en/public-comment/proceeding/registration-data-request-service-rdrs-policy-alignment-analysis-30-10-2025>

Background¹

The purpose of this open proceeding is to collect community input and generate community discussion on the proposed roadmap for aligning the RDRS-related policy gaps identified in the paper and to help inform discussions between the ICANN Board and the GNSO as they assess the work of the Privacy and Proxy Services Accreditation Issues (PPSAI) IRT and Registration Data Policy IRT and begin to discuss the consensus policy recommendations for an System for Standardized Access/Disclosure.

Documents

- [Registration Data Request Service Policy Alignment Analysis \(PDF, 806.55 KB\)](#)

Related RySG comments

- [RySG comment on RDRS Standing Cmte. Report for GNSO Council Review](#) (29 September 2025)

Registries Stakeholder Group (RySG) comment

The gTLD Registries Stakeholder Group (RySG) welcomes the opportunity to provide comments on the Registration Data Request Service (RDRS) Policy Alignment Analysis (the “Analysis”). We appreciate the Board’s initiative in requesting this comprehensive policy alignment analysis and we look forward to receiving further details on what the Board considers the next steps. In this comment, we focus on the items of direct relevance to registry operators.

Regarding the issue of law enforcement authentication, the RySG is of the view that the elements identified in the Analysis as relevant to a policy alignment on phased, federated authentication — more specifically, the RDRS Standing Committee’s Recommendation #2 on

¹ Background: intended to give a brief context for the comment and to highlight what is most relevant for RO’s in the subject document – it is not a summary of the subject document.

including authentication of specific user groups, beginning with law enforcement, in the RDRS; the EPDP Phase 2 SSAD Recommendations, in particular Recommendation #1 on the establishment or selection of a central Accreditation Authority capable of accrediting users globally; Recommendation #2 on a separate accreditation process for governmental entities to support contracted-party decisions before granting access to data; and Recommendation #9 on the automated processing of certain requests, including law enforcement requests (where technically and commercially feasible and legally permissible), as noted in the Analysis Paper in Section 4, the “Phased Federated Authentication” language — together constitute a sufficient basis to support moving forward with said policy development work.

However, we strongly note that policy work related to law enforcement authentication should focus on the contracted parties' use of a system or mechanism once it is created, and NOT on the creation or design of a system or mechanism. Because the Urgent Requests language as currently proposed makes a law enforcement authentication mechanism a requirement, the outcomes of this Analysis Paper should also contemplate the gap between a designed system or mechanism and how, and who, evaluates that system or mechanism, to ensure it fulfills the needs of all parties before it's designated by ICANN as the law enforcement authentication mechanism.

The RySG notes the following text from the purpose section: *“The analysis is structured to present an overview of ongoing work, identify possible gaps, propose a path forward, and illustrate alignment with the RDRS Standing Committee’s recommendations to the GNSO Council. The paper also includes suggested next steps needed to ensure that the long-term solution for requesting gTLD nonpublic registration data disclosure incorporates the identified requirements.”*

The RySG is supportive of the RDRS standing committee’s recommendations to the GNSO council and encourages the Board to take them into account when considering next steps and in informing their anticipated bi-lateral discussions with the GNSO council.