30 July 2025

Privacy and Proxy Services Accreditation Issues Implementation Review Team Threshold Question Responses for the Attention of the GNSO Council

Table of Contents

Background

In October 2013, the Generic Names Supporting Organization (GNSO) Council initiated a Policy Development Process (PDP) to make recommendations for consistency across proxy and privacy services in the ecosystem. In December 2015 the PDP Working Group (WG) published a set of Privacy and Proxy Service Accreditation Issues (PPSAI) recommendations in its Final Report which were adopted by the ICANN Board in August 2016.

Initial Implementation
The implementation team, ICANN organization (ICANN org) supported by a volunteer Implementation Review Team (IRT), began implementation of the PPSAI recommendations in 2016. Initial implementation focused on the development of a model that would create a new accreditation program and agreement for all providers of privacy and proxy services, modeled on ICANN's registrar accreditation program. This implementation work was put on hold in 2019 due to overlapping issues with ongoing work in the GNSO's Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data (hereinafter "EPDP Phase 1"), in light of the work to address the European Union General Data Protection Regulation (GDPR).

Continued Implementation
With the publication of the Registration Data Policy, which implements the EPDP Phase 1 recommendations, ICANN org called for volunteers to convene an IRT to support continuing implementation of the approved PPSAI recommendations. At ICANN79, ICANN org shared its planning work including an Implementation Analysis of the PPSAI recommendations, and developed a set of overarching threshold questions as a first step to guide the IRT's work. The IRT reconvened, with its first meeting during ICANN80 in June 2024.

Introduction

There have been notable changes to law, policy, and industry practices since the PDP WG first developed PPSAI recommendations and the first IRT started work on implementation. The Registration Data Policy, based on the EPDP Phase 1 recommendations, has been developed and is set to take effect in August 2025. New systems have also been developed to support requests for the disclosure of data, such as the Registration Data Request Service (RDRS) pilot which was implemented at the direction of the ICANN Board to help inform policy decisions related to a System for Standardized Access/Disclosure to Nonpublic gTLD Registration Data (SSAD).

Threshold Questions
To ensure these changes are considered in the implementation of PPSAI recommendations, the IRT was tasked with responding to the following threshold questions:

- **Policy:** Are there any policy questions or items IRT already wants to bring to Council for guidance? (Threshold Question A)

- **Accreditation Model** (Accreditation Program or Alternative Implementation): Can an implementation model without a new standalone accreditation program remain consistent with the policy recommendations? (Threshold Question B)

- **Disclosure Frameworks** (Intellectual Property and Law Enforcement): Are there specific areas to revisit under new law/policy (ICANN org to share assessment for IRT review)? (Threshold Question C)

- **Alignment of Privacy/Proxy Policy with Related Work**: Can these frameworks be aligned with existing work on RDRS, Registration Data Policy, and other existing procedures and remain consistent with the policy recommendations? (Threshold Question K)

The following table illustrates the relationship between the threshold questions and the impacted PPSAI recommendations:

Threshold Questions		Summary	Recommendations Impacted
A	Policy Questions	Terminology and definitions of terms relating to privacy and proxy services over time	All - with a focus on Rec 1 (Definitions)
B	Accreditation Models	Accreditation model with full accreditation agreement as drafted by the former IRT versus alternative, more efficient models, including proposition of two such models.	All - with a focus on Sec. 1.3.2 Additional General Recommendations
C	Disclosure Framework	Asks whether the Illustrative Disclosure Framework (Annex B of the PPSAI Final Report) is to be treated as a hard policy requirement, as akin to implementation guidance, or as a suggestion that may be adapted or completely reformed in implementation.	Recommendations 1, 15, 19, 20
K	Alignment of Privacy/Proxy Policy with Related Work	Similarities between "High Priority" (PPSAI LEA draft Disclosure Framework) and "Urgent" (Registration Data Policy issue) requests - potential for alignment	All - with a focus on Recommendations 19, 20.

IRT Work

The IRT participated in 19 PPSAI sessions over the course of 13 months to consider the provided PPSAI Threshold Questions. During this period, ICANN org facilitated the IRT's review and discussion of the following documents:

- PPSAI Final Report (7 December 2015)
- Presentations from IRT Members on current practices and the state of the industry at ICANN81 (14 November 2024)
- IRT Archived Working Document on threshold questions (5 December 2024)

    - Threshold Question B original draft language can be found here (19 June 2025)
- Definitions Comparison between the PPSAI Final Report (Dec 2015) vs the Draft P/P Accreditation Agreement (Sept 2018) (19 December 2024), also referred to as "Definitions Comparison Paper (FR vs PPAA)"
- Disclosure Frameworks Assessment (6 February 2025), also referred to as "Disclosure Frameworks Assessment Paper"
- ICANN org's Implementation Analysis (2 March 2024)
- Alignment of Disclosure Frameworks to Existing Work/Procedures (7 March 2025), also referred to as "Alignment Paper"
- PPSAI Accreditation Models Paper (12 May 2025) and discussed at ICANN83 (11 June 2025), also referred to as "Accreditation Models Paper"

IRT discussion of these documents informed the team's responses to the threshold questions and the guidance it is requesting from the GNSO Council. The IRT was also given the opportunity to raise additional questions, provided questions met the following criteria:

1. *Is derived from a specific recommendation number or section* of text in the Final Report that requires implementation,
2. Is *within the remit of the GNSO Council*, and
3. Either:
    a. *Specifies new information or changed circumstances since the Final Report was adopted* by the Council in 2016 which call for new guidance, OR
    b. *Specifies unintended consequences, not considered by the WG*, that will result if recommendation is implemented as written.

A list of candidate threshold questions that were discussed by the IRT but not ultimately agreed to for the GNSO Council's consideration can be found in the Candidate Threshold Questions Not Adopted by the IRT document.

Threshold Question Responses and Requests for Guidance

Note on Broader IRT PPSAI Discussion
It must be noted that the IRT raised broader questions regarding the implementation of PPSAI recommendations during the course of its work that fell outside of its remit.

These questions include:

- Are the recommendations still useful given the range of changes in law, policy, industry practices, and development of systems for data disclosure requests?
- Would implementation of the recommendations be worth the time and effort it would take to implement?
- Should the recommendations be reexamined at the policy level?
- Are the issues at the heart of the recommendations now a nonissue given that most registration data is no longer public?

- Furthermore, one IRT proposal which was discussed suggests departing from the accreditation models, and indeed from implementation approach, in order to make requirements flow down the chain towards registrants using their services on behalf of third parties. See Threshold Question B below for a more detailed discussion of this proposal. It should also be noted that this is dependent on Threshold Question A (definitions) when it comes to what counts as a proxy service provider.

These questions provide important context for the Threshold Question responses and guidance requested below and are relevant for the GNSO Council to consider when determining next steps for PPSAI.

Note on Interdependence of Threshold Questions
The implementation team notes that the threshold questions contained in this document are interdependent. That is to say, when a change is proposed in one threshold question, the knock-on effects on other Threshold Questions should be taken into account. For example, a change in Threshold Question A (definitions) may change how Threshold Question B (accreditation models) should function.

Threshold Question A

Category 1: Policy: Are there any policy questions or items IRT already wants to bring to Council for guidance?
IRT Response: Yes, see the team's response and request for the GNSO Council guidance below.

IRT members identified a set of questions and concerns around implementing the definitions used in Recommendation 1 of the Final Report as written. In the implementation work ICANN org did with the previous IRT, the group updated some definitions for purposes of clearly stating a policy requirement. For example: the Final Report states: "*"Disclosure" means the reveal of a person's (i.e. the licensee or beneficial owner of a registered domain name) identity/contact details to a third party Requester without Publication in the WHOIS system,"* whereas the Draft Privacy & Proxy Service Provider Accreditation Agreement (Draft PPAA), prepared by the former IRT in 2018, defines this as: "*1.13 "Disclosure" means the revealing of a Customer's identity or contact details to a third-party Requester without Publication in the Registration Data Directory Service."* Please see the Definitions Comparison Paper (FR vs PPAA) for a comparison between the PPSAI Final Report (Dec 2015) and the Draft PPAA (Sept 2018).

In addition, some IRT members have expressed concerns that the definitions in the Final Report do not take into account changes in privacy laws/regulations, as well as changes to the applicable contracts and/or ICANN Consensus Policies. These members provided feedback that the definitions may no longer be suitable or relevant to the current landscape related to privacy and proxy services.

Requested guidance from the GNSO Council: Before initiating IRT discussions to formulate the definition language for the policy, the implementation team asks for guidance from the GNSO Council on the scope of what can be adjusted in implementation. Can the terms be modified, deleted, or added? This issue occurs in two ways:

Issue 1: The concepts of “privacy services” and “proxy services” as defined in the Final Report are not consistently reflected in the services operating in the marketplace today. For example, ICANN is aware that services may operate using the word “proxy” but appear to provide services that would be defined as “privacy” under the Final Report definition, and vice-versa. While this could appear to merely be an issue of terminology, the distinction is important because there are significant legal and contractual differences between proxy and privacy services.

In other cases, a registrant may be registering names in a manner that would fit within the definition of a “proxy” service, but that registrant is not approved or authorized by a registrar to do so (such as law offices registering domain names on behalf of their clients, etc.). As discussed at length with the prior PPSAI IRT, this raises implementation challenges because it may be difficult or impossible in some cases for a registrar to know at the time of registration if a registration involves a privacy or proxy service that falls within the scope of the policy requirements. This also raises questions about how to create a bright-line rule, as a matter of ICANN Consensus Policy, defining when a registration is considered to be one involving a “proxy service” (subject to the policy requirements) versus some other arrangement between the Registered Name Holder and the beneficial user of a domain name that is outside the scope of the policy requirements (but may be subject to other requirements under Section 3.7.7.3 of the RAA).

In light of this, should the concepts be revisited as a matter of policy to align with current market practices, or should these concepts be hard-coded into the policy requirements as originally recommended in the Final Report? If the former, should this occur (a) through a GNSO process (such as a PDP, EPDP, or GGP) because they are part of the approved policy recommendations, or (b) through ICANN org’s work with the IRT and with updates confirmed by the GNSO Council as appropriate?

Issue 2: The definitions in the Final Report contain words and phrases within them that are, themselves, not consistently understood. Can and should ICANN, in consultation with the IRT, proceed to define these terms, so that the final policy language is commonly understood? For example, in prior work with the IRT, ICANN developed draft language in consultation with the IRT that defined the privacy or proxy service “Customer” as “the licensee or beneficial owner of a registered domain name.” If the final policy defines these additional terms, does the GNSO need to be consulted on these definitions prior to the implementation of the final policy-related materials to ensure consistency with the intention of the Final Report recommendations?

Background

- **Existing Terms**
    - The concepts of “privacy services” and “proxy services” as defined in the Final Report do not appear to be consistently reflected in the services operating in the marketplace today.
    - Read strictly, the definition of “proxy service” in the Final Report could be read to apply to any circumstance in which one party is the registered

name holder, but another party actually uses the domain name (e.g. an attorney who registers a domain name in the attorney's name on the client's behalf). Should ICANN org be applying this strict read in drafting the implementation-related materials, or was a different result intended?

- This also relates to Threshold Question B. As stated above, under current definitions, a lawyer or law firm registering a domain in their own name on behalf of their client would appear to be counted as a proxy service. Depending on the GNSO Council's response to this threshold question, this may mean, reading the Final Report definitions strictly as written, that such cases would become a category of unaffiliated providers, having a knock-on effect for the accreditation model chosen as per Threshold Question B. Such a case would also require discussion in implementation, to create a bespoke solution for providers that would then be required to seek accreditation.

- **Undefined Terms**
  - Words used within the definitions in the Final Report do not appear to be consistently understood. For example, "beneficial user", "privacy or proxy customer", and "the licensee or beneficial owner of a registered domain name" are each used in Recommendation 1, and it is unclear whether these phrases should be interpreted to mean the same thing, or whether different phrases were purposefully used to indicate that the meaning in each context is different.

Some examples of specific comments from IRT members include:

"*We in the PPSAI IRT may not understand these terms to mean the same things. Which of these terms [Beneficial Owner, Licensee, Registered Name Holder, Beneficial User] identifies the role of the entity who is legally responsible (and culpable) for how the domain is used?*"

"*... definitions do not match the services offered on the market.*"

"*This definition seems written to obfuscate instead of clarify. It is not clear to the uninitiated that the Proxy Service is the RNH (that licenses the use to the original customer).*"

"*... those definitions need rewriting in the light of actual practices.*"

"*we need to go back to the drawing board with regard to some of these definitions, since they're simply untenable at this point.*"

In light of the aforementioned background, ICANN org and the IRT are considering how the implementation should proceed, as the uncertainty surrounding the definitions contained in the Final Report is expected to raise questions about how the substantive requirements contained in the Final Recommendations should be implemented.

The implementation team would also like to flag that definitions serve as a foundational element of any policy, and making fundamental changes to definitions can alter the impact or applicability of recommendations contained in a PDP Final Report. With the aim of improving consistency and clarity, the implementation team expects that any definition alterations or changes should be applied with caution, considering the impact this could have on other recommendations, and indeed on other threshold questions in this document.

Threshold Question B

Category 2: Accreditation Model: Accreditation Program or Alternative Implementation. Can an implementation model without a new standalone accreditation program remain consistent with the policy recommendations?
IRT Response: Yes, see the team's response and request for the GNSO Council guidance below.

The PPSAI Final Report title contains the words "Accreditation Issues" and the report uses the phrase "Accreditation Program" throughout its text. Section 1.3.2 (Additional General Recommendations) states:

> "*Finally, the WG has concluded that the registrar accreditation model with its multiple steps, governed by the RAA, may not be entirely appropriate for P/P services; however, it is a useful starting point from which relevant portions may be adapted to apply to P/P service providers. The implications of adopting a particular accreditation model will need to be worked out as part of the implementation of its policy recommendations, if adopted.*" (PPSAI Final Report, p. 19)

In recognition of this, the prior implementation team discussed a new accreditation program for implementation of the new recommended requirements for these services that was modeled on ICANN's gTLD registrar accreditation program. At the outset of the previous IRT's efforts, ICANN and the IRT discussed various potential approaches to "accreditation" and landed on this approach in recognition of the fact that the PPSAI PDP intended for multiple types of business models to be "accredited" in the program, including entities that are not registrars or registrar-affiliated.

While this was the approach aligned upon at the time, there appear to be reasons to evaluate whether, today, this approach is still the best path forward. Due to changes in the DNS ecosystem, and the reality of how the majority of known Privacy and Proxy services operate

(namely, with some relationship to the registrar[1]), there may be a more efficient path to implementation of these policy recommendations.

The Final Report does not define "Accreditation Program" or provide any recommendation concerning the specifics or processes that such a "Program" should entail. The origin of the phrase appears to be due diligence recommendations from law enforcement (which were endorsed by the Governmental Advisory Committee in its Nairobi Communiqué of 2010) in relation to the negotiation that led to the 2013 Registrar Accreditation Agreement (see Annex G to RAA Improvements Final Report at https://gnso.icann.org/sites/default/files/filefield_15005/raa-improvements-proposal-final-report-18oct10-en.pdf). In that document, law enforcement recommended that proxy/privacy registration services should be "accredited by ICANN using the same due diligence process as a Registrar/Registry" and that "Registrars are to accept proxy/privacy registrations only from ICANN accredited Proxy Registration Services."

An IRT member has suggested that the lack of a Policy recommendation concerning what "Accreditation Program" means should be flagged in escalating a question to the GNSO Council:

> "*The PPSAI did not conclude or recommend Accreditation, and I don't believe it was supposed to, the charter appears to clearly assume Accreditation. I have not found any community lead effort that recommended an Accreditation Program for Privacy and/or Proxy Services. I think fundamentally, the Council needs to evaluate if an Accreditation Program is needed/wanted by the community (in an open process), before any of these features can be honestly considered.*"

An IRT member who served on the PDP WG shared their understanding that the aim of the WG was "*to develop and/or streamline a contractual relationship between ICANN and the P/P service provider. The intent all along is to establish rules for that provider with a set of requirements they are obliged to observe. I recall the accreditation criterion was the administrative framework to establish the contractual relationship.*"

With the understanding that the intent of the recommendations was to provide rules for Privacy and Proxy Services and create contractual obligations relating to Privacy and Proxy Services that may be enforced by ICANN (regardless of how these obligations are contractually structured), this appears to be possible without a new standalone accreditation agreement and accreditation process, which may, in many cases, be duplicative of due diligence and Contractual Compliance enforcement that ICANN already performs with respect to registrars.

As part of the effort to introduce this issue, the IPT drafted, in consultation with the IRT, a paper on Accreditation Models. It should be noted that this document's intent was not the selection of an accreditation model, but rather an illustration of possible pathways to accreditation that seem to exist based on the PPSAI Final Report recommendations (based on the quoted text above from Section 1.3.2, p. 19; "adopting a particular accreditation model"). **The IRT discussions did**

[1] It should be noted that RAA 3.12.4 would allow any new P/P consensus policy to be drafted in such a way that it requires registrars to list both affiliate and reseller P/P service providers to ICANN. Similarly, the P/P spec in the RAA already obliges registrars to comply, and to require its affiliates and resellers to comply, with the terms of that Specification (see here: https://www.icann.org/en/resources/registrars/raa/approved-with-specs-27jun13-en.htm#privacy-proxy).

not identify any elements of any of these accreditation models that would be inconsistent with the policy recommendations.

However, because the PPSAI Final Report is unclear as to whether its reference to an "Accreditation Program" reflects an intention, as a matter of ICANN Consensus Policy, that ICANN must implement a standalone accreditation program for Privacy and Proxy services that looks, contractually and operationally, like the registrar accreditation program, the GNSO Council's input is requested on this issue.

Requested guidance from Council: The GNSO Council is invited to reflect upon whether the policy recommendations would preclude any (if at all) of the three models from being feasible accreditation models when it comes to implementation of this policy.

Additional Discussion within the IRT
The IRT also discussed a proposal that Privacy and Proxy providers be considered as simply another type of registrant, as the goal ultimately is to hold Privacy and Proxy providers accountable and ensure they fall (essentially) under the same rules for data disclosure as registrars already do. The proposal suggested:

> *"e.g ensuring that registrants are bound by terms that we understand pp providers should follow. This would cleanly avoid all bureaucratic overhead, avoid having to differentiate between affiliated or non-affiliated providers, etc. This can be done by a simple policy requirement that would require registrars to pass along certain terms to all registrants through their agreements, gTAC, policies or otherwise." Under this proposal, language might read: "Registrars must ensure that registrants using their services who register domain names for the sole use of, on behalf of or for the benefit of third parties agree to... ."*

Questions were raised in the IRT around passthrough obligations and practicalities around compliance and enforcement. It was also noted that this proposal might require a rewrite of the existing policy recommendations, and as such is relevant to the note on broader IRT PPSAI Discussion above. It should also be noted that, depending on the GNSO Council's response to Threshold Question A on definitions, a registrant registering a domain name on behalf of a third party (in the common example, a lawyer or law firm registering a domain on behalf of a client), may be counted as a proxy service, or may not be counted as such a service.[2] IRT discussions on this proposal model can be located on the IRT's email list.

Note: Due to the timing of this proposal, the implementation team was unable to discuss this model at the same level of detail as the models referenced in the Accreditation Models document. If the community believes this type of model should be used to implement new requirements for privacy and proxy services (with or without additional policy development to

[2] See the second bullet under the headings Existing Terms > Background in Threshold Question A above

effect this), ICANN org notes that additional issues, such as the differences between privacy vs proxy services, would need to be considered and addressed. For example, how could or should this type of model work in the case of a privacy service, where the user of the service is the Registered Name Holder (commonly referred to as the "registrant"), not the service provider, which would, by contrast, be the RNH for names registered using a proxy service)?

Threshold Question C

Category 3: Disclosure Frameworks (Intellectual Property and Law Enforcement): a) Are there specific areas to revisit under new law/policy (ICANN org to share assessment for IRT review)?
IRT Response: No, however, see the team's response and request for the GNSO Council guidance below.

ICANN org understands that the use of the term "illustrative" in the "Illustrative Disclosure Framework" was meant to give the Implementation Review Team flexibility in the final policy language. ICANN org notes, however, that the Working Group did spend a considerable amount of time working through this framework and likely expected this type of framework (albeit not necessarily verbatim to Annex B) to be part of the final policy.

Requested guidance from the GNSO Council: Can the GNSO Council provide guidance on if:

(a) The Illustrative Disclosure Framework is policy, and the IRT is expected to implement it as is; or
(b) The Illustrative Disclosure Framework is meant to be akin to implementation guidance, which would mean the IRT has some flexibility in how to implement this into the policy, and there could be changes, but changes to it are to be communicated transparently; or
(c) The Illustrative Disclosure Framework is an example, but does not amount to policy or implementation guidance, and the IRT has the option of not including it in any form in the final policy or of changing it substantially, so long as the omission or changes are communicated transparently?

In drafting this question, ICANN org notes that some members of the IRT have expressed concerns with a verbatim interpretation of at least one clause in the Illustrative Framework.[3]

Furthermore, the draft Disclosure Framework also includes the following clause (Draft PPAA (Markup version 12 Sept 2018), p. 61):
"*3.3 Disclosure can be reasonably refused by Provider, for reasons consistent with the general policy stated herein, including any of the following:*"

[3] In addition to this issue, some IRT members have questioned the appropriateness of one of the "use cases" included in the disclosure framework (where a domain name resolves to a website where a copyright is allegedly infringed). There may be further substantive questions or concerns identified with the disclosure framework, but this merely provides an example of types of issues that have been raised with respect to the framework thus far.

ICANN org, as well as IRT members, have asked the question: what are "reasons consistent with the general policy stated herein" (PPSAI Final Report, p. 91)? The same question has been asked of the draft LEA framework developed by the previous IRT (see the Draft PPAA (Markup version 12 Sept 2018) drafted by the former IRT, p. 52).

ICANN org and the IRT invite the GNSO Council to view their Draft Disclosure Frameworks Assessment (From 2018 Privacy and Proxy Service Provider Accreditation Agreement (PPAA), as well as a paper on Alignment of Disclosure Frameworks with Existing Work/Procedures aimed at responding to Threshold Question 3(b): *Can these [disclosure] frameworks be aligned with existing work on the Registration Data Request Service (RDRS), Registration Data Policy, and other existing procedures and remain consistent with the policy recommendations?*

Threshold Question K

Category 3: Disclosure Frameworks (Intellectual Property and Law Enforcement): b) Can these frameworks be aligned with existing work on RDRS, Registration Data Policy, and other existing procedures and remain consistent with the policy recommendations?
IRT Response: Yes, see the team's response and request for the GNSO Council guidance below.

With the aim of understanding the potential areas of alignment, ICANN org drafted, and the IRT reviewed, a paper on Alignment of Disclosure Frameworks with Existing Work/Procedures focused on responding to Threshold Question 3(b). Multiple areas were identified where alignment with Registration Data Policy as well as with RDRS, SSAD, and/or successor systems may be desirable.

Assumption 4 of the Alignment Paper states:
"*There is no current policy to oblige anyone to use the RDRS system. If requests were to be received by P/P providers via RDRS, SSAD, and/or successor systems or any other tool or process, and we would like to oblige P/P providers to respond to these via a certain tool or process, then the assumption is that this would require additional policy work as no such requirements currently exist within the PPSAI Final Report (newer tools and processes postdate the PPSAI Final Report).*"

In particular, the IRT discussed a parallel between the concept of priority levels in the disclosure frameworks and the "urgent request" issue in the implementation of the EPDP Phase 1 Registration Data Policy. Subject to the response to Threshold Question C, the IRT has discussed that the issues for high priority requests (for P/P) and "urgent" requests for gTLD registration data are the same.

Requested guidance from the GNSO Council: As a matter of policy (particularly considering that there was no agreement in the former PPSAI IRT about what the appropriate timeline for

high priority requests should be), it may be helpful for the PPSAI implementation to align with the approach for Urgent Requests in the Registration Data Policy, if one is developed. Would the GNSO Council have any concerns about this?

It is further noted that Council will further consider the EPDP Phase 2 (SSAD) policy recommendations in a dialogue with the ICANN Board. In considering this question, does the GNSO Council have any additional guidance on how coordination or alignment on overlapping areas among PPSAI implementation and the RDRS, SSAD, and/or successor system might occur?

Annex A: Resource Links

Historical Documents

- PPSAI Final Report (7 December 2015)
- Working Documents from the former IRT (initiated in 2016)
    - Deaccreditation Draft (2017)
    - Draft PPAA (Markup version) (12 September 2018)[4]

Current IRT Working Documents

- IRT Archived Working Document on Threshold Questions (5 December 2024)
- Definitions Comparison between the PPSAI Final Report (Dec 2015) vs the Draft P/P Accreditation Agreement (Sept 2018) (19 December 2024), also referred to as "**Definitions Comparison Paper (FR vs PPAA)**"
- Disclosure Frameworks Assessment (6 February 2025), also referred to as "**Disclosure Frameworks Assessment Paper**"
- ICANN org's Implementation Analysis (2 March 2024)
- Alignment of Disclosure Frameworks to Existing Work/Procedures (7 March 2025), also referred to as "**Alignment Paper**"
- Considered PPSAI Accreditation Models (12 May 2025), also referred to as "**Accreditation Models Paper**"

See also

- Presentations from IRT Members on current practices and the state of the industry at ICANN81 (14 November 2024)

[4] Please note that Specification 3: Law Enforcement Authority Disclosure Framework Specification, and Specification 4: Intellectual Property Disclosure Framework Specification (pp. 50-62) of this document have more recently been adapted and annotated by ICANN org and reviewed by the IRT, see the **Disclosure Frameworks Assessment Paper** referenced in this Annex. Note also that Specification 4 of the draft PPAA in particular was adapted from Annex B of the PPSAI Final Report by the former IRT. Annex B also states that "The WG has not developed a similarly detailed process for other types of Requesters, e.g. law enforcement authorities or consumer protection agencies." Therefore, the former IRT took it upon itself to develop such a framework for law enforcement authorities which resulted in Specification 3 of their draft PPAA.