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Generic Names Supporting Organization

Registration Data Request Service (RDRS) Standing Committee (SC) Council Report

10 November 2025

Status of This Document

This is the Findings Report of the Registration Data Request Service (hereafter "RDRS") Standing Committee (hereafter "SC"), covering topics related to registration data requests and access. The four assignments given to the RDRS SC by the GNSO Council are:

- Assignment #1: Trends that can be identified over a month-by-month period;
- Assignment #2: Possible technical updates that should be considered to RDRS and/or related messaging and promotion (recognizing that the RDRS will only be running for a two-year period and limited resources may be available to implement such updates);
- Assignment #3: Specific lessons learned that should be factored into the consideration of how to proceed with the SSAD (System for Standardized Access/Disclosure) Recommendations;
- Assignment #4: Suggestions to the Council for a proposed recommendation(s) to the ICANN Board in relation to the consideration of the SSAD recommendations.

Preamble

The objective of this Findings Report is to document both the RDRS SC's deliberations on the four assignments referenced above and the SC's recommendations to the GNSO Council. One of the main purposes of the RDRS is to collect data about system usage to help inform future discussions between the GNSO Council and the ICANN Board on the pending Recommendations 1–18 from the Final Report of the GNSO Expedited Policy Development Process on the Temporary Specification for gTLD Registration Data Phase 2.

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Executive Summary

Introduction

The ICANN Board directed ICANN org in February 2023 to develop and launch the Whois Disclosure System, now called the RDRS, as requested by the GNSO Council. In November 2023, the ICANN org launched the RDRS and began collecting and publishing the metrics associated with the RDRS. In January 2024, ICANN released the first RDRS metrics report.

One of the main purposes of the RDRS is to collect data about system usage, particularly to help inform future discussions between the GNSO Council and the ICANN Board on the pending Recommendations 1–18 from the Final Report of the GNSO Expedited Policy Development Process on the Temporary Specification for gTLD Registration Data Phase 2.

The RDRS was implemented as a "proof of concept" pilot program and was developed with input from the GNSO Small Team to gather and assess system usage and demand data, including (without limitation) information about the volume of requests, categories of users, and type of requests submitted, to better understand the demand for such a system. Over the first year of its operation, the system was utilized for over 22,000 domain lookups and 2,260 disclosure requests. While the pilot has demonstrated some level of demand for such a service, several operational, procedural, and adoption/awareness challenges remain.

In providing this report to the GNSO Council, the aim of the RDRS SC is to provide:

- Recommendations to GNSO Council;
- Lessons learned in relation to SSAD recommendations and how to proceed with them;
- Proposed System enhancements;
- Observed trends during the RDRS pilot.

As part of its first assignment, the SC was tasked with reviewing data on a monthly basis to assess the functioning and usage of the RDRS pilot. To support this work, ICANN Org published detailed monthly reports, which the SC reviewed regularly and also presented to the GNSO Council as part of its ongoing updates. This consistent data review, combined with the SC's collective experience and insights gained from the operation of the RDRS, enabled the SC to fulfill its subsequent Assignments (Assignments 2 to 4) by developing informed findings and conclusions. These are reflected throughout this report. For reference and transparency, a comprehensive set of metrics covering the period from the pilot's launch through June 2025 is included in Annex C.

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.

Public Comment Incorporation

The Standing Committee thanks each contributor for the public comment and acknowledges the importance of the perspectives shared. As outlined in the introduction to the Finding Report, the SC`s work is advisory in nature and does not represent formal policy recommendations. The SC's role is to provide analysis and advice to assist the GNSO Council in its deliberations. While the public comments align largely with the topic and considerations already discussed by the SC, the SC recognizes the importance of ensuring that community input is clearly and transparently reflected in the report. To that end, the SC has agreed to include a concise summary of the public comment under each relevant recommendation to reflect the broader input received. With this update, the SC believes that the report and its recommendations more effectively support the Council`s considerations of the issues and contribute to an informed policy discussion. In addition, the SC has added an additional item to recommendation 3 and has incorporated public comment considerations in the table of recommendation 5 where warranted.

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 somewhat 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.

Public Comments on Recommendation 1

The majority of public comments generally agreed with this recommendation, noting that so long as the RDRS remains voluntary for Registrars, it should continue while additional discussions and work are ongoing. The minority of commenters noted that the RDRS has proven unsatisfactory for both requestors and registrars and should be discontinued. Some commenters have noted that the RDRS has proven unsatisfactory to requestors due to lack of contracted party participation, significant inconsistencies in decision-making across registrars, lack of transparency in the review process, and inadequate disclosure standards that frustrate legitimate requestors. Lastly, one commenter notes that the RDRS should only be continued as a cost-recovery system that remains voluntary for registrars.

The RDRS SC discussed the comments received and ultimately agreed to keep this recommendation, noting that the system should continue as voluntary while discussions on the RDRS or a successor system remain ongoing.

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.

Public Comments on Recommendation 2

The majority of commenters fully support Recommendation 2, noting the importance of knowing a requestor's identity and affiliation in reviewing a request. Many commenters note that while it's acceptable to begin with law enforcement, other interested groups should also be included in future authentication groups. The SC notes the recommendation suggests beginning with law enforcement; this recommendation is not meant to be read as restricting the addition of other user groups in the future. One commenter does not support additional financial resources being put toward this; however, the SC recognizes that the majority of the community recognizes this enhancement as important.

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 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.

Public Comments on Recommendation 3.1

The majority of public comments fully support the inclusion of an API; a minority of commenters noted that while they support the addition of an API, they support it only if costs of building the API are prefaced on a cost-recovery basis, i.e., borne by requestors. The SC notes that ICANN org has noted these enhancements will not be added while discussions between the Board and GNSO Council are ongoing, and those conversations will likely include the topic of financial sustainability. For that reason, the SC proposes to leave this recommendation as is.

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.

Public Comments on Recommendation 3.2

The majority of commenters fully supported the engagement of a UX designer to improve the request forms in order to ensure the forms are both simple and intuitive for requestors. One commenter noted the UX designer should also be engaged to ensure the experience is improved for registrar users as well. Lastly, similar to the other proposed enhancements, a minority of commenters noted that enhancements such as the engagement of a UX designer should only be done on a cost-recovery basis, i.e., costs borne by RDRS requestors.

3.3. 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.

Public Comments on Recommendation 3.3

The majority of public comments support the optional inclusion of ccTLD operators in RDRS; however, a minority of commenters raised concerns about policy and operational concerns, given that ccTLD operators are not bound by ICANN policies. A minority of commenters also noted that registries were not contemplated as part of the RDRS pilot; accordingly, there would be contractual implications to registrars who offer the TLDs of ccTLDs who optionally participate in RDRS. One commenter also noted that important details would need to be worked out if this were to proceed, including if a request is forwarded to a registrar and a ccTLD registry, what happens if they reach different conclusions? Considering this, this commenter notes that if ccTLD operators are permitted to use RDRS, it may be appropriate for a registrar to opt in to process requests for ccTLD data disclosure through RDRS.

3.4. Inclusion of link to Disclosure Request Information/Systems for Non-Participating Registrars

The SC recommends the RDRS include a link to the disclosure request information or disclosure request system of non-participating registrars when provided by the registrar.

Recommendation Rationale:

The RDRS is voluntary for registrars, but requestors may not know which registrars are not participating. For that reason, if a requestor attempts to initiate a request only to receive a response of, “Registrar is not participating in RDRS,” that is an unsatisfactory experience for the requestor. In circumstances where a non-participating registrar provides a link to their request form or request system, and that link is then included in RDRS responses involving the non-participating registrar, this would improve the requestor experience by directing the requestor to the appropriate place to send a request.

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

4.1. Privacy/Proxy Data

The RDRS SC notes that there is no requirement for registrars to disclose P/P data. While some participating registrars voluntarily choose to disclose the information associated with Affiliated P/P Providers, the Standing Committee recommends, based on the feedback from requestors, the GNSO Council should consider the question of if there should be a requirement for registrars to consider requests for underlying data from Affiliated P/P Providers in the RDRS or its successor for further policy work.

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.

Public Comments on Recommendation 4.1

Public comments were split on this recommendation. Some commenters noted the importance of proceeding with policy work on the disclosure of privacy/proxy data of affiliated providers. One comment noted this recommendation needs more specificity in terms of what the further policy work is, and some commenters did not support additional policy work on this topic due to the current work on the implementation of PPSAI recommendations, which is still ongoing.

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.

Public Comments on Recommendation 4.2

The majority of commenters support the inclusion of RDRS links in RDAP responses, with one commenter highlighting this as one of the most important steps to be taken to raise awareness of RDRS. The minority of commenters do not support this recommendation, noting that this does not make sense from a technology perspective, and an RDAP client such as (lookup.icann.org) is the appropriate place to put the link where it can be displayed in human readable format (rather than buried in an RDAP response). One commenter also noted that RDAP responses should not be updated to point to a temporary system.

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.

Public Comments on Recommendation 5

The majority of commenters support this recommendation as written, noting the importance of the Board considering the recommendations as one interdependent package. One commenter notes a concern that a blanket rejection of all the recommendations may result in unnecessary relitigation and throwing away even the recommendations the SC supports. The SC discussed the concerns but notes it is not recommending the recommendations be disregarded or thrown away; instead, the SC believes the lessons learned should be incorporated into updated recommendations that could be adopted by the Board.

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 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.

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
#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 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.

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

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
#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 obtained, and there are no SLAs in RDRS.	**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.

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
#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 [if] 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. 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.	**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). Note: Adding this feature will require updates to RDRS; currently, there is only a free-form entry if “other” is selected as the denial reason. In order to accomplish this, a free-form entry would be needed for all denial options. 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; however, this two-way communication method must have security features that prevent unauthorized access, e.g., encryption. 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 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.

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
#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 track use of priority levels.	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. 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.	**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 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. For “urgent requests” specifically, the SC notes that timelines for this category of requests are currently being discussed within the EPDP Phase 1 Implementation Review Team. Any Registrars have noted that in its current form, the RDRS is not the appropriate system to use for Urgent requests as defined in the in-progress Registration Data Policy implementation work due to the lack of authentication for LEA requestors and lack of push functionality to notify the Rr when a request was made. Other members of the SC note that agreement on timelines for urgent requests under the Registration Data Policy need to match what is in RDRS for consistency.

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
#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**	High	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).

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
#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 technical limitations and would encourage consideration of alternatives (perhaps via a new API). Public comments were not aligned on this rationale. Some comments noted that the pilot has confirmed that it is not possible to automate disclosures, while some comments that automation is feasible and the concerns around privacy rights could be addressed, resulting in time and cost savings.

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
#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. 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".

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
#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.

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
#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 reviewing the recommendation text holistically.

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
#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 specifics determined by the accreditation provider. For example, public safety agencies may choose to waive fees for their constituent members. The SC 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.

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
#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).

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
#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.

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
#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	**Modify**	Low	The SC notes that the reporting providing during the RDRS pilot period differs from what is specified in SSAD Rec #17. 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. The RDRS reporting has been helpful and well received and therefore the original Rec should be modified to reflect that.

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
#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-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.

Public Comments on Recommendation 6

The majority of public comments support the continuation of the Standing Committee in the recommended form, though some commenters note the Standing Committee should not continue until the Board reaches a decision. One commenter notes the Standing Committee could continue but under a different remit, which is to address the ongoing RDRS-related concerns of requestors and contracted parties.

Conclusion and Next Steps

The Consensus Call on the recommendations contained in this Findings Report, as required by the RDRS SC Charter, was carried out by the SC, as described in 'Annex B: Consensus Designations.' In summary, five recommendations received "Full Consensus" and one recommendation received "Consensus". For further details about the decision-making methodology and consensus designation, please see 'Section V: Decision Making Methodologies' in the RDRS SC charter, which is contained in Annex A within this Findings Report.

For next steps, the RDRS SC Findings Report will be published for Public Comment and eventually submitted to the GNSO Council for consideration prior to the eventual dialogue between the GNSO Council and ICANN Board regarding the EPDP Phase 2 policy SSAD recommendations.

RDRS SC Methodology

Methodology for Deliberations

The RDRS SC deliberations continued primarily through conference calls scheduled bi-weekly, in addition to email exchanges on its mailing list. The RDRS SC held working sessions during the ICANN80, ICANN81, ICANN82, and ICANN83 public meetings for the progress of the RDRS pilot and RDRS Findings Report. These sessions provided an opportunity for the broader community to contribute to the RDRS SC deliberations on the charter topics being discussed. All of the RDRS SC's work is documented on its wiki workspace.[1] It includes its meetings, meeting notes, deliberation summaries, mailing list, draft documents and background materials.[2]

During the first year of the RDRS Pilot, the RDRS SC used its meetings to observe the RDRS usage trends and metrics, published monthly on the ICANN.org. The RDRS SC also provided various system enhancements during the RDRS pilot to improve reporting, user experience and data gathering. In addition to the wiki and mailing list, the RDRS SC used the RDRS Workbook to document its observations and proposals, which are reflected in this report. During ICANN81, after the first year of the RDRS pilot, the RDRS SC concluded that it had gathered enough data to start drafting its Findings Report. In February 2025, ICANN Org published the RDRS Annual Report. This report is based on the numbers from the Annual Report which will have changed by the time of publishing this report.

Accountability to the GNSO Council

The RDRS SC delivered regular updates to the GNSO Council to inform the Council on the status and progress of its work. As described in its Charter, the RDRS SC should consult with the GNSO Council on whether this report, which is intended as a factual account of their work, not a policy document, should be published for Public Comment prior to the submission of the report to the Council. When considering this question, the GNSO Council noted that all GNSO SG/Cs are represented in the Standing Committee. In addition, the RDRS SC benefits from active participation by representatives from GAC, SSAC and ALAC, and it has received community input during ICANN public sessions. However, some members of the GNSO Council felt strongly that the Findings Report should be published for Public Comment, and, accordingly, the SC is publishing this report for further community input.

Other Findings

Assignment 3 - Lessons Learned that should be factored into how to proceed with the SSAD recommendations

The WHOIS Disclosure System Design Paper, which is the basis for RDRS, considered a more lightweight and cost-effective system for access to and disclosure of gTLD registration data than SSAD, and includes a comparison of the expectations noted by the GNSO Small Team for a proof

[1] Wiki space here: https://icann-community.atlassian.net/wiki/spaces/EOTSFGRD/pages/115682434/RDRS+Standing+Committee

[2] Mailing list archives can be found at https://lists.icann.org/hyperkitty/list/gnso-rdrs-sc@icann.org/

of concept idea to the 18 GNSO Council-approved policy recommendations for a System for Standardized/Access Disclosure to non-public registration data (SSAD) from the Temporary Specification for gTLD Registration Data Phase 2 Expedited Policy Development Process (EPDP Phase 2) team.

When compared to the SSAD/EPDP Phase 2 recommendations the RDRS shares some common attributes while there are also distinct differences in system design, operational goals, and feasibility. The RDRS was envisioned as a free, interim, and cost-effective service utilizing existing ICANN technologies, based on the Centralized Zone Data Service (CZDS) design, with the intent to streamline access to non-public gTLD registration data without incorporating full accreditation, requestor identity verification, or automation of review processing. SSAD was envisioned as a fully centralized, standardized access model with predefined accreditation levels and automated processing options.

At a high level, and noting that this is not a complete list, the RDRS deviates from the SSAD-related recommendations in several ways:

- It does not include central or governmental accreditation authorities.
- It does not include accreditation of the requestors.
- It does not include identity verification of requestors.
- It does not include an abuse investigator.
- It does not include a billing function or any fees for use.
- There is no obligation or expectation of automated processing of certain requests by contracted parties.
- Participation is on a voluntary basis only and only open to ICANN-accredited gTLD Registrars.

Accordingly, experience and learning gained from the operation of the RDRS may not comprehensively address questions regarding the SSAD but can still assist in the consideration of a follow-up system.

Limitations in assessment include:

- Usage volume may not accurately reflect true demand for any follow-on system, such as SSAD. The levels of RDRS usage could be due to lack of awareness of the system or any number of other factors. If requestors assume that submitting a request for data access will guarantee disclosure of the data (as the pre-GDPR Whois functioned), their dissatisfaction at not receiving requested data in all cases could result in lower subsequent usage.

The SC was tasked to consider the lessons it learned from RDRS, and, based on the lessons, make suggestions to the GNSO Council for a proposed recommendation(s) to the ICANN Board in relation to the consideration of the SSAD recommendations. The observations and suggestions presented are based on input from the SC and a review of the monthly RDRS usage metrics. The SC used a workbook to track its observations as it reviewed the data every month. They reflect the SC's interpretation of the data and stakeholder feedback to date (June 2025). In making its ultimate recommendations to the Council, the SC discussed and analyzed what they believe worked and what didn't work. The analysis below summarizes the main lessons learned:

- **Lesson Learned: SSAD policy recommendations -** The RDRS design does not address all of the Council-approved policy recommendations for the SSAD; instead, it identified which functionalities could be kept or removed to provide a design for a disclosure system that would make it simple and cost effective for the requestors and the registrars to submit and receive requests for nonpublic gTLD registration data. The RDRS aligns broadly with one of the SSAD recommendations, while with adjustments further alignment could be achieved to eleven other SSAD recommendations. The RDRS differs significantly with the SSAD in five recommendations, which relate to accreditation (Rec#1 and Rec#2), response timing (Rec #10), financial sustainability (Rec #14) and audits (Rec#16).

- **Lesson Learned: System Development of RDRS -** ICANN org estimated the development of the RDRS would take approximately nine months. The system was developed by ICANN org and did not involve any external vendors. ICANN Org began its development work on the RDRS, as directed by the ICANN Board on 27 February 2023. As requested by the ICANN Board, ICANN Org was given eleven months from the resolution date to launch the new system and incorporate requirements and success criteria from the GNSO Small Team for the purpose of gathering usage and demand data during this two year pilot program. The development work focused on the following three areas: (1) Requestor Platform Development, (2) Registrar Platform Development, and (3) Metrics and Reporting Development.
    - System development coincided with ongoing policy reviews, resulting in some deviations from the original design white paper, which impacted resource estimations and contributed to some delays. However, the system was ultimately delivered within the eleven-month timeframe. The Org experienced some challenges in developing the requestor platform within the eleven-month timeframe due to resource constraints and extended discussions on feature requirements and feature prioritization.
    - The RDRS registrar platform was added to the existing Naming Services portal for contracted parties. Implementation of the RDRS persona was relatively routine; however, ICANN did experience challenges in developing a solution for registrars who preferred not to log in to the NSp platform, which involved creation of a complex solution for PGP-encrypted messaging. This feature consumed a significant portion - approximately 30% - of the project's time and resources. To date, registrars using RDRS have not adopted this feature as it is not compatible with most ticketing platforms.
    - The development of designs and metric dashboards was relatively easy, though some challenges arose when adjusting for new metrics and refining existing metrics.

- **Lesson Learned: Participation -** SSAD was considered as a mandatory system. RDRS is based on voluntary participation. Optional registrar participation resulted in approximately 60% of gTLD domains under managements available [at the height of registrar participation]. The limited participation of registrars may have resulted in reduced requestor participation. To ensure broader user satisfaction and registrar coverage, SC members discussed potentially expanding RDRS to ccTLDs. Some SC members advocate for inclusion of ccTLDs for broader coverage, while others emphasized the need for further discussion and further technical consideration. In general, there seems to be an agreement that considering ccTLD participation could prove worthwhile. Furthermore, while some active members of the ICANN Community have closely followed the progress of the RDRS, there are many within the requestor community who are still unaware that the RDRS exists, which may have resulted in reduced requestor participation. According to the RDRS Annual Report, disclosure requests were made from numerous countries, with the highest number of submissions coming from the United States (503 total requests) and UK (54).

- **Lesson Learned: Recommendation #1- Accreditation –** The EPDP Phase 2 Report recommends the establishment of, or selection of, an Accreditation Authority. The RDRS SC recognized partial accreditation, including authentication of law enforcement, as key for RDRS or any follow-up system. RDRS experience has shown that requests were improperly categorized as Law Enforcement requests. The lack of requestor accreditation or validation may have led to longer response times as participating registrars were unable to validate the identity of the requestor. SC members also noted that authentication is generally not difficult to determine; the onerous part of data disclosure is generally not authentication but rather balancing the requestors' documented proof of purpose/need versus the registrant's right to privacy. Other SC members highlighted concerns about potential abuse of the system by authenticated requesters, particularly from jurisdictions with weak protections for human rights. Hence, SC members suggest exploring how requestor validation may be best addressed in a follow-on system, possibly starting with law enforcement accreditation. The GNSO small team considered whether accreditation should be part of the RDRS , 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.

- **Lesson Learned: Recommendation #2 – Accreditation of governmental entities –** The EPDP Phase 2 Report recommends that the SSAD must provide reasonable access to registration data for entities that require access to this data for the exercise of their public policy tasks. As described in the lesson learned above, the RDRS SC came to the conclusion that accreditation for law enforcement is key for processing RDRS requests properly. The GAC PSWG is currently exploring options that may be included on the front end of RDRS for law enforcement accreditation.

- **Lesson Learned: Recommendation #3 – Criteria and Content of Requests –** The EPDP Phase 2 Report recommendation aims to allow for standardized submission of requested data elements, and to require all necessary information to evaluate and make a disclosure decision, including any supporting documentation. Through its outreach to requestors, SC members have observed that the RDRS user forms may be overcomplicated. Some SC members and requestors suggest simplifying request form, and only asking for information that is necessary and not already known. RDRS SC members discussed clarifying the legal basis options, particularly the General Data Protection Regulation (GDPR) articles, to prevent users from defaulting to "Other." Some SC members also suggested providing in-form guidance or tooltips explaining how to determine the appropriate legal basis. Currently, RDRS offers templates to allow auto-filling for repeating information. However, Rec #3 requires that a request must include Identity and Signed Assertion information as defined in Recommendation #1, which is currently not available in the RDRS.

- **Lesson Learned: Recommendation #4 - Acknowledgement of receipt and relay of the disclosure request.** In RDRS 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. The RDRS SC made no further observation on this.

- **Lesson Learned: Recommendation #5 - Response Requirements –** The response timelines associated varied largely, which caused uncertainty for requestors. The RDRS SC 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 could necessitate changes to both the User Interface for requestors and registrars and may necessitate creating a dynamic two-way communication system within RDRS. The implementation guidance of Recommendation #5 supports back-and-forth communication between requesters and registrars.

- **Lesson Learned: Recommendation #6 - Priority Levels:** The EPDP Phase 2 Report recommends three priority levels for requests (urgent requests, ICANN administrative proceedings, and all other requests). RDRS currently offers two categories: Standard Request and Expedited Request, which is distinct from urgent requests discussed in Rec#6. In the RDRS Annual report, 3% of requests were labelled as “expedited”, and participating registrars reported that most requests marked as expedited failed to meet relevant criteria. Misclassification issues lead to inefficiencies, and downgraded requests are hard to track, affecting reporting accuracy. It could be worthwhile to consider an update to the categorization or a refinement on the definition of expedited requests. The capacity for RDRS to triage "Urgent Requests" was not included in the RDRS pilot, but the ability to make an "Expedited Request" is not the same thing. RDRS guidance on expedited requests suggests that requestors "Do not rely on this Expedited Review Request functionality in emergency situations such as but not limited to an imminent threat to life, serious bodily injury, critical infrastructure (online and offline), or child exploitation. In these circumstances you should contact the Registrar directly for immediate assistance. For the Registrar's contact information, please refer to this page." Yet registrars have indicated that the contact information in the linked page is NOT appropriate for such emergency circumstances. The SC would support ICANN collecting and maintaining contact information designated by Registrars as appropriate for “expedited request” purposes, using such contacts for routing of “expedited requests” where appropriate, and NOT publishing this information publicly (so as to mitigate the risk of such contacts being misappropriated).

- **Lesson Learned: Recommendation #7 - Requestor Purpose –** The EPDP Phase 2 Report recommends that requestors MUST submit data disclosure requests for specific purposes. This is a mandatory field within RDRS. The SC had made no further observation on this.

- **Lesson Learned: Recommendation #8 - Contracted Party Authorization -** This recommendation is largely directed to the decision-making process of registrars, which the RDRS cannot address. However, the system currently does not allow bulk processing and limits registrars to responding to each request individually as per recommendation EPDP Phase Recommendation# 8.1. Furthermore, 8.6 includes "If the Contracted Party determines that the request is not valid, e.g. it does not provide sufficient ground for a substantive review of the underlying data, the Contracted Party MUST request the Requestor to provide further information prior to denying the request.” RDRS does not have a direct communication feature for requestor and Registrar to communicate through the system**.**

  Moreover, one of the clear lessons learned was that there was a disconnect between the decision-making process of registrars and communication of those decisions and the processes and standards applied in rendering those decisions. By providing more clear communication and documentation of disclosure decisions, better requests can be formulated and the expectations of requestors (and thus the value that they then perceive in the effort and costs of making requests) can be level set. Based on nearly two years of community experience and prior policy work, including the EPDP Phase 2 Final Report, several improvements are recommended for the RDRS (on the basis of the original Rec#8 text): Contracted parties should conduct a prima facie review of a

request's validity, requesting additional information from the requestor if needed before denial,[3] ensuring complete submissions and clarity on requirements. If a request passes this initial review, a thorough evaluation mirroring the SSAD's steps is required: determining if disclosure involves personal data and, if not, disclosing it unless prohibited by law (with the law specified to the requestor).[4] For personal data requests, contracted parties must assess the lawful basis for disclosure, necessity of data elements, and whether a balancing or review is needed, documenting and sharing these details—applicable law, its application, and any balancing conducted—with the requestor.[5] When GDPR applies, a balancing test weighing the requestor's legitimate interests against data subjects' rights is mandatory. For requests not needing this test and involving personal information, disclosure must occur if a lawful basis exists and no legal prohibition applies[6]; provided, however, the human rights of the registrant, if applicable, must be taken into account in the disclosure decisions. A denial with the documented reasoning (i.e., the applicable law prohibiting disclosure) and the human rights assessment analysis is required. Refusal based solely because the purpose is to investigate a violation of law is prohibited unless legally mandated by applicable law. All decisions, approvals, or denials must be documented[7] and the rationale shared with requestors, adhering to EPDP Phase 2 SLAs of 3–10 business days for non-urgent requests.

- **Lesson Learned: Recommendation #9 - Automation of SSAD Processing -** The EPDP Phase 2 Report recommendations includes the automation of the receipt, authentication, and transmission of SSAD requests to the relevant Contracted Party insofar as it is technically and commercially feasible and legally permissible. The RDRS allows for Rec#9.1, which requires the automated transmission of a well-formed request to the registrar of record. The remainder of the recommendation focuses on automation of disclosure decisions, which is not included in the RDRS. However, Rec#9 also references accredited users, which are defined in Rec#1, which is not reflected in the RDRS. The RDRS SC has made no further observations on this.

- **Lesson Learned: Recommendation #10 - Determining Variable SLAs for response times for SSAD -** The variability in response times, especially for denied (9.49 days) versus approved (6.25 days) and publicly available requests (3.26 days), could suggest inefficiencies in handling complex or non-compliant requests, or could suggest that requests are kept open when they may be denied in order to give the requestor time to provide data to support approval. Some SC members support including a corresponding required timeframe for requestor responses to potentially reduce overall response time. RDRS could also include a "pending requestor input" status (see Assignment 2) which would support tracking the duration requests that remain pending input.

[3] This is consistent with Recommendation 8.6.
[4] This is consistent with Recommendation 8.7.1.
[5] This is consistent with Recommendation 8.7.2 and its subsections.
[6] This is consistent with Recommendation 8.9.1.
[7] This is consistent with Recommendation with 8.9.1 and 8.9.2.

- **Lesson Learned: Recommendation #11 - SSAD Terms and Conditions -** For requestors, RDRS Terms and Conditions are presented to the requestor upon first login and acceptance captured by the system. The ability to print or download the Terms and Conditions is offered. For registrars, the NSp Terms and Conditions cover this additional functionality. However, Rec #11 references an accreditation process as defined in Rec #1, which is not reflected in RDRS. [The SC did not make a further observation on Rec#11.

- **Lesson Learned: Recommendation #12 - Disclosure Requirement –** The EPDP Phase 2 Recommendation entails that Contracted Parties (CPs) only disclose the data requested by the Requestor. RDRS SC members did not have an objection or concern about this recommendation; however, some RDRS SC members noted that there may be a need for additional education for requestors, as the submission of an RDRS request does not necessarily mean that data will be disclosed; the balancing test is still required and determinative of the outcome.

- **Lesson Learned: Recommendation #13 - Query Policy –** The EPDP Phase 2 Report recommends monitoring the system and taking appropriate action, such as revoking or limiting access, to protect against abuse or misuse of the system. The RDRS currently does not rate limit requestors; RDRS includes some limited functionality for protection against abuse or misuse but not the full extent as described in Rec# 13. [The SC did not make a further observation on Rec#13.

- **Lesson Learned: Recommendation #14 - Financial Sustainability –** The EPDP Phase 2 report recommends that the SSAD is financially self-sufficient without causing any additional fees for registrants, and that Requestors of the SSAD data should primarily bear the costs of maintaining this system. The ICANN Board approved the use of the Supplemental Fund for the Implementation of Community Recommendations (SFICR) to cover the cost of the RDRS pilot development and up to two years of operations.

    - **RDRS Cost Overview**: The EPDP Phase 2 Report recommends that the SSAD is financially self-sufficient without causing any additional fees for registrants, and that Requestors of the SSAD data should primarily bear the costs of maintaining this system. The ICANN Board approved the use of the Supplemental Fund for the Implementation of Community Recommendations (SFICR) to cover the cost of the RDRS pilot development and up to two years of operations.

    - **RDRS operational costs** included:
      1. RDRS development costs (non-recurring) totalled $1,646,835 over the pilot period. This includes ICANN staff time dedicated to development (implementation, QA, etc) policy support, administrative work, outreach and education to spread awareness for RDRS, etc. The majority of the prelaunch costs are for personnel time dedicated to launching RDRS.
      2. As of June 2025, RDRS operational costs (recurring) associated with keeping the system running on an ongoing basis totalled $1,223,958, an average of $64,419 / month over a 19-month period. This includes ICANN staff time dedicated to system maintenance (bug fixes, security updates, etc), system enhancements, metrics reporting, surveys, outreach and education, and supporting the work of the RDRS SC. The majority of operational costs

post-launch are for personnel time dedicated to ongoing operations during the pilot.
3. ICANN staff have advised that $40,000 /month is a reasonable estimate of the anticipated cost of maintaining the system as is while the Board and GNSO Council discuss the next steps for the SSAD recommendations. For the avoidance of doubt, this estimate does not include any additional enhancements to the system but is an estimated monthly cost of maintaining the system as is.
4. Marginal per-request costs (approximating the additional cost of each new request initiated) were trivial ($0).

- **Considerations regarding financial sustainability:** As the purpose of the RDRS pilot project is to gather data to further inform the Operational Design Assessment's consideration of costs of building and operating the SSAD, the RDRS SC discussed Recommendation #14 and the RDRS costs.

- **Recommendation 14 provides:** 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. Furthermore, Data Subjects MUST NOT bear the costs of processing of data disclosure requests, which have been denied by Contracted Parties following evaluation of the requests submitted by SSAD users. ICANN MAY contribute to the (partial) covering of costs for maintaining the Central Gateway. For clarity, the EPDP Team understands that registrants are ultimately the source of much of ICANN's revenue. This revenue does not per se violate the restriction that "[d]ata subjects MUST NOT bear the costs for having data disclosed to third parties." Data subjects MUST NOT be charged a separate fee by the Central Gateway for having their data requested by or disclosed to third parties. However, the EPDP Team notes that registered name holders will always indirectly bear any costs incurred by registrars and registries. The EPDP Team also understands that the RAA prohibits ICANN from limiting what Registrars may charge. RAA 3.7.12 states: "Nothing in this Agreement prescribes or limits the amount Registrar may charge Registered Name Holders for registration of Registered Names."

- The SC acknowledges the value of a lightweight system to standardize the disclosure request process and distribute requests to registrars, as well as the potential value of the possible enhancements discussed for the RDRS. However, some SC members suggest if the RDRS were to continue or any successor system were to be created, it must adhere to the consensus reached in Recommendation #14 relating to Financial Sustainability. Other SC members disagree with this and do not suggest that the current RDRS should not charge fees as the current RDRS lacks important features such as mandatory participation.

- Some members of the SC note that a more flexible reading of Recommendation 14 may be warranted given ongoing discussions regarding an authentication

mechanism. Specifically, some SC members note that requestor groups are currently self organizing to assist with the heavy lift and associated costs of requestor authentication. (See Recommendation 2.) This action, if expanded, represents a potential shouldering of a significant portion of the SSAD's projected operational costs, and, accordingly, may mitigate against a strictly-applied per-request or per-accreditation fee.

Actuals Through 30 June 2025			
Registration Data Request Services	Personnel	External Vendors	Total USD
Development (Dec 2022 - Nov 2023)	$1,630,335	$16,500	$1,646,835
Operation (Dec 2023 - June 2025)	$1,106,194	$117,764	$1,223,958
Project To Date	$2,736,529	$134,264	$2,870,793
Unaudited - any arithmetic inconsistencies are due to rounding			

- **Lesson Learned: Recommendation #15 – Logging -** The EPDP Phase 2 report recommends that the appropriate logging procedures MUST be put in place to facilitate the auditing procedures outlined in these recommendations. 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. However, 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.

- **Lesson Learned: Recommendation #16 – Audits –** The EPDP Phase 2 recommendation includes audit requirements for Accreditation Authority, Identity Providers and Accredited entities/individuals. However, these are defined in Rec #1 and accreditation is not included in the RDRS.

- **Lesson Learned: Recommendation #17 - Reporting Requirements –** The EPDP Phase 2 Report recommends that ICANN org must establish regular public reporting on the use and functioning of the SSAD. During the pilot period, ICANN org has produced monthly usage reports based on metrics agreed upon with the Standing Committee. ICANN Org has also published a more comprehensive annual report. Reporting may continue in current form or with further small adjustments, including the timing of reporting being less frequent, ultimately, resulting in cost savings.

- **Lesson Learned: Recommendation #18 - Review of implementation of policy recommendations concerning SSAD using a GNSO Standing Committee –** The RDRS represents the pilot that aims to gauge demand and lessons learned on how to proceed with the SSAD recommendations. 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.

Assignment 2 - Possible Technical Updates to the RDRS

This chapter delves into the proposed system enhancements which were requested by individual RDRS SC members and community members and discussed within the full SC. Additionally, ICANN org presented insights gathered from user experience interviews during the pilot period and shared them with the SC for its consideration. These discussions provided a foundation for identifying gaps in the system and prioritizing enhancements that would improve usability, compliance, and efficiency.

The SC prioritized enhancements based on (a) the associated "level of effort" ICANN org estimated to implement those changes and (b) the importance of the change request to the group sponsoring the change . Each enhancement request was carefully assessed based on its complexity, resource requirements, and anticipated impact. The SC worked collaboratively to determine whether specific enhancements should be considered for implementation during the pilot phase or deferred for future consideration. This structured approach ensured that enhancements addressed immediate needs while maintaining a balance between feasibility and long-term goals. The following sections outline the enhancements implemented during the pilot,

those still pending, and future recommendations for the potential continuation of the RDRS or a follow-up system.

The RDRS pilot phase has demonstrated potential in standardizing requests for disclosure of nonpublic registration data. However, some gaps and challenges persist, particularly in scalability and user experience. The RDRS or any future system would benefit from further refinements to address stakeholder concerns and improve system functionality.

The system enhancements introduced by the RDRS SC during the pilot phase were designed to improve the usability and functionality of the RDRS, addressing key challenges identified through usage experiences and stakeholder feedback. These efforts reflect the SC's commitment to refining the system and making it a valuable tool for Registrars, Requestors, and the broader ICANN community. However, to ensure a sustainable solution for RDRS or a potential follow-up system, more substantial system enhancements are recommended.

Implemented Enhancements

The first year of the RDRS pilot introduced several improvements designed to enhance system usability and address feedback received from stakeholders. These enhancements aimed to improve the user experience and streamline the request process, making the system more functional for both Registrars and Requestors.

The below table shows the implemented system enhancements:

Proposal	**Stakeholder Group**	**Goal/Rationale**	**Level of Effort**	**Did the implementation meet the expectations? Effectiveness**	**Implementation Date**
Address & phone should be mandatory	Registrars	Reduce denials due to omission of key submission request information/ Trends in approved requests following its implementation. This information is necessary as part of evaluating the request	1-3 months	Yes	June 2024
Show the request date in the page with all the information (not just in the list of requests).	Registrars	Provides context on timing for the registrar when reviewing and prioritizing work in RDRS/ Improved Registrar user experience	1-3 months	Yes	June 2024

Proposal	Stakeholder Group	Goal/Rationale	Level of Effort	Did the implementation meet the expectations? Effectiveness	Implementation Date
Add a field where the Requestor can provide an organization or affiliation if applicable (optional field)	Registrars	This information is needed for the registrar's evaluation of the request.	1-3 months	Yes	June 2024
Send Requestor back to list of pending requests upon saving a request	Requestors	User experience improvement that saves the Requestor time.	1-3 months	Yes	October 2024
Report the count of LEA requests "per country" and "per economy".	Requestors (Noncommercial Stakeholder Group)	In order to align the system with the standard processes of reporting on law enforcement agencies' requests, it was agreed that the monthly report should include the number of law enforcement queries per country and economy	4-6 months	Yes	November 2024
Enable Fully Qualified Domain Names (FQDNs) to be input into RDRS. When a Requestor provides a FQDN, ensure the entire FQDN is passed to the participating registrar (i.e., that it is not	Requestors	To clarify which domain names and TLDs are accessible through RDRS and which aren't.	1-3 months	Yes	April 2024

Proposal	Stakeholder Group	Goal/Rationale	Level of Effort	Did the implementation meet the expectations? Effectiveness	Implementation Date
truncated to a partially qualified domain name).					
Allow registrars to recategorize requests	Registrars	To avoid Requestor mis-labeling requests and/or to provide for the ability to correct errors.	4 - 6 months	Yes	January 2025
Increase the open text field character limit from 1,000 to 2,000.	Requestors	Allow more space for Requestors to explain the reason for the request, and allow registrars more space to explain denials.	1-3 Months		June 2024
Add new language and a link to RDRS on the ICANN Lookup Tool results page.	Requestors	Make it easier for users to get to RDRS when using the ICANN's Lookup tool.	1-3 months	Yes	August 2024

Pending Enhancements

Many of the planned system enhancements were successfully implemented, however, the below table shows the pending system enhancements on a more granular level:

Proposal	Stakeholder Group	Goal/Rationale	Level of Effort
Some law enforcement Requestors are working on front-end (user facing) WHOIS query tools; an RDRS API (contemplated also in the following section 4).	Requestors	To enable existing LEA tools and portals to connect to RDRS. Such an API may materially benefit efforts to authenticate LEA requests. Aim to assist in user authentication of law enforcement	12+ months

		Requestors at scale.	
Add "pending input" status to requests[8]	Registrars	Better ability to track & understand status of requests	3 months
Possibility to change request outcome OR create a followup request[9]	Registrars	Better ability to correctly note outcomes	2 months

The “front-end query tool” proposal extends beyond the scope of the current RDRS pilot period. However, it is recommended to continue exploring this initiative, as it might contribute to the establishment of a standardized API for broader implementation. The RDRS SC recommends consideration of an **API Integration for both Registrars and Requestors** in the proposed future enhancements (see details in §4 below). This should include security, privacy, and human rights assessments before implementation of an API.

Proposed Future Enhancements

In addition to improving the RDRS during the two- year pilot, the SC has also considered potential future enhancements for the RDRS or its follow-up system. The SC believes the proposed system enhancements below may resolve some of the challenges observed during the pilot and may transform the RDRS into a more sustainable and comprehensive system for managing access to nonpublic registration data.

The RDRS SC acknowledges that some of the proposed system enhancements have dependencies that require significant time and effort, and, in some cases, new policy work to implement. Recognizing these complexities, the SC has established a priority rating/ranking to determine which enhancements should be addressed sooner and which ones can be considered later.

The below table shows potential future system enhancements:

[8] As noted under Recommendation 3, 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 ICANN org could undertake suggested enhancements under the specific direction of the ICANN Board."

[9] As noted under Recommendation 3, 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 ICANN org could undertake suggested enhancements under the specific direction of the ICANN Board."

Proposal	Stakeholder Group	Goal/Rationale	Priority Raking (1 to 10)	Risk/Dependencies
Develop an Application Programming Interface (API).	Registrars and Requestors	To enhance system interoperability and streamline data exchange between users and the RDRS. Suggested ICANN documents what challenges exist to the creation of such an API for community consideration in evaluating the cost / benefit of features in a successor system.	1	API implementation may require ICANN to leverage existing systems and create new system integrations which will require more developed requirements, as well as cost and resource estimates.
Requestor validation.	Registrars and Requestors	Preventing unauthorized data access. Reducing the risk of fraudulent or improper use of the system. The GAC/ PSWG (Public Safety Working Group) is working on a law enforcement front end solution to help with law enforcement authentication. This work may further inform potential cost savings options for Law Enforcement identity validation, which was identified as a significant contributor to SSAD cost estimates. Law enforcement might be the first stakeholder group and the system could later expand to verifying other users.	2	Leveraging the SC's work on the front-end solution for RDRS, once it's completed, may enable ICANN to leverage and extend the existing ICANN account platform to facilitate the same authentication/validation process used by the FBI LEEP (Law Enforcement Enterprise Portal) system for identifying law enforcement.
Inclusion of privacy/proxy providers	Requestors	Integrate privacy/proxy providers into RDRS and allow registrars with affiliated privacy/proxy services to disclose data requested through RDRS in accordance with applicable laws. Many disclosure requests through RDRS involve registration data that is held by privacy/proxy providers, which often requires the Requestor to submit an additional disclosure request to the privacy/proxy service to obtain the registration data.	3	Inclusion of privacy/proxy providers may require additional policy work and/or coordination with the team implementing the policy recommendations on Privacy and Proxy Services. Registrars with affiliated privacy/proxy services may already disclose data through RDRS, though the SC is only aware of two registrars doing so currently. Registrars may require legal due process before disclosing underlying data but requestors generally

Proposal	Stakeholder Group	Goal/Rationale	Priority Raking (1 to 10)	Risk/Dependencies
				will not provide that due process through RDRS.
Suggested for including optional participation for ccTLDs in the future system.	Requestors		4	RDRS is currently only for ICANN-accredited registrars and registries are not included. ccTLDs do not have contractual obligations with ICANN or standardized operational requirements, so, there will be challenges with this implementation. There is also no central platform (like NSp) that ccTLDs use that could be leveraged for processing requests. ccTLDs don't all operate a Registry & Registrar model, and it may be more relevant to direct requests for ccTLDs working with resellers or not using RDAP directly to ccTLD operators.
Possibility to disclose the registration data via the RDRS, in compliance with applicable privacy laws.	Requestors		11	
A UX designer is recommended to make the form more user friendly, it might add to better reporting.	Requestors	This aims to help with reducing the denial rate by the registrars as the highest rated reason for denial was repeatedly incomplete requests.	12	ICANN used a UX designer when creating RDRS, and would require more specific input from Registrars and Requestors to implement changes.
Recommended that RDRS links be included in RDAP responses to ensure discoverability across all registrar	Requestors		5	This would require new policy recommendations. Whois and now RDAP follow clear specifications as per the Registry Agreements and Registrar Accreditation

Proposal	Stakeholder Group	Goal/Rationale	Priority Raking (1 to 10)	Risk/Dependencies
systems. Highlighted the need for updates to the RDAP profile to standardize this feature.				Agreements. 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.
Suggested moving away from Salesforce as the platform for RDRS due to its limitations. Proposed using more flexible software Suggested that many of the limitations raised by RDRS SC might be due to use of salesforce software.	Registrars	To improve scalability and address character limits and integration challenges.	14	This would require developing a completely separate system for registrars (outside of NSp) and has both development time and cost implications given resources for RDRS are the same as for the Next Round. Regardless of platforms/frameworks, the Small Team agreed early that the pilot would be developed internally, cognisant of the fact that a long term solution may benefit from being externalised. Running a tender process was not deemed practical in the context of a pilot, but the topic should definitely be revisited for a long term solution even if that means re developing RDRS from the ground up.
Reword the legal basis question in RDRS to "Are you asserting that you have a legal right to this information?" (yes or no) or "What is your legal basis to access this	Registrars	The legal basis question in RDRS ("Are you asserting a legal basis under which you would process the requested data pursuant to the European Union General Data Protection Regulation or other applicable law?") seems to be a source of confusion. Many Requestors	7	This could be a change that would require a change in the request form and therefore in the data collection and reports.

Proposal	Stakeholder Group	Goal/Rationale	Priority Raking (1 to 10)	Risk/Dependencies
data?" (just a dropdown menu, and maybe put 'other' at the top instead of bottom)		select "no", but they do have a legal basis. It may be that they don't know what their basis would be under the GDPR. Further, it seems unlikely that any disclosure request would be granted without a legal basis		
Question pertaining to the Requestor's "legal basis". Make this question optional to answer.	Requestors	The question seems to apply unnecessary friction to law enforcement requests. Adjust the phrasing of this. question to make clear that it is optional and that the request may be submitted even if the Requestor has no familiarity with GDPR or similar data protection law. A similar but differently phrased question might read "Would you like to provide an (optional) description of your legal basis under GDPR or similar law to accompany this request?" , which could be used or ignored (not answered one way or the other), and thus avoid the risk of a misinterpreted "No" leading to declination of the request.	9	
Make 'expedited' requests easily visible in the RDRS User Interface (UI)	Registrars	Difficulties seeing the expedited requests at a glance. The 'confidential' column is a checkbox - it is recommended to consider making the 'expedited' feature also be a checkbox instead of a status column with standard or expedited.	6	Dependent on Level of Effort required by ICANN and resource availability.
Make the public RDDS info visible within the request so the Rr (and Requestor) can more easily see the available data.	Registrars	Sometimes the domain has Privacy/Proxy or real-public data and the Registrar does not notice, so the response is less helpful.	8	Requires development work and system integration to display RDDS results for each domain search in NSp and the RDRS Requestor platform. ICANN resources for RDRS are the same as those for the Next Round.

Proposal	Stakeholder Group	Goal/Rationale	Priority Raking (1 to 10)	Risk/Dependencies
Bulk Upload of requests.	Requestors	Improve use of RDRS by requesters who manage multiple domains and batches of requests	10	Requires API development to include error handling of records in the batch. Also need additional documentation for bulk upload users.
Registration data preservation function in RDRS.	Requestors	Similar to Meta Platforms, before criminals or suspects delete their account. How RDRS can allow requests for the retained data.	13	This is not supported by the full SC. Furthermore, some members think it is out of scope for this system.
Add a feature in RDRS which links to information for non-participating Rrs, i.e. link to non-participating Rr request system, link to contact information provided by non-participating Rr	Registrars and Requestors	The aim would be to include a link/message in RDRS in cases where the requestor attempts to submit a request to a non-participating Rrs. Instead of a message noting the registrar is not participating in RDRS, the requestor would receive a message directing to the Rrs individual web from/contact data (as applicable) to request non-public Registration Data. This would enhance user experience and help requestors identify the correct address/system to request Registration Data.	This was added after the ranking of the system enhancements took place but received high support from the Standing Committee.	

The RDRS SC believes that implementing these broader enhancements would effectively resolve some of the challenges observed during the pilot, improving system performance and aligning with the needs of stakeholders. By adopting these system enhancements, the RDRS could evolve beyond its pilot into a more sustainable, scalable, and comprehensive system for managing access to nonpublic registration data.

While the RDRS Pilot is running on a SalesForce platform controlled and developed by ICANN Org, the SC would recommend reviewing this choice for long-term efficiency. It recommends in particular to compare with what could be built by external vendors on a different ticketing platform or a bespoke one. This exercise, which would involve running open tenders to poll the market, is out of scope of the SC, but the SC notes that a decision on which direction to take (remain on ICANN's SalesForce or not) should be taken before spending time and money on enhancing the current.

A successor platform may take time to come online, and some of the above enhancements may be deemed urgent enough to build on the current platform even if for a time limited use; but the SC recommends these decisions be taken knowingly, rather than assuming the Pilot is suitable to become the long term solution because it already exists. It is important to note that the requestor platform is not built on Salesforce. Registrars use the salesforce platform via NSp.

Assignment 1 - Trends That Can Be Identified Over a Month-by-Month Period

The Registration Data Request Service (RDRS) was developed to gather and assess data related to the broad landscape of registration data disclosure requests, including (without limitation) information about the volume of requests, categories of users, and type of requests submitted, to better understand the demand for such a system. Furthermore, the RDRS aims to streamline the process of requesting and disclosing domain registration data in compliance with applicable privacy laws.

The RDRS tracks and reports on a comprehensive set of data points. Beginning in January 2024, ICANN org began publishing monthly RDRS usage metric reports as requested by the Generic Names Supporting Organization (GNSO) Council. The reports provide a detailed description of each included metric. ICANN org publishes all reports on its dedicated RDRS webpage.

The RDRS SC was responsible for reviewing the monthly metrics usage reports in detail with an eye toward: (i) observing trends in data and (ii) recommending improvements in the readability of reports. The below focuses on the metrics from November 2024 until 30 June 2025.

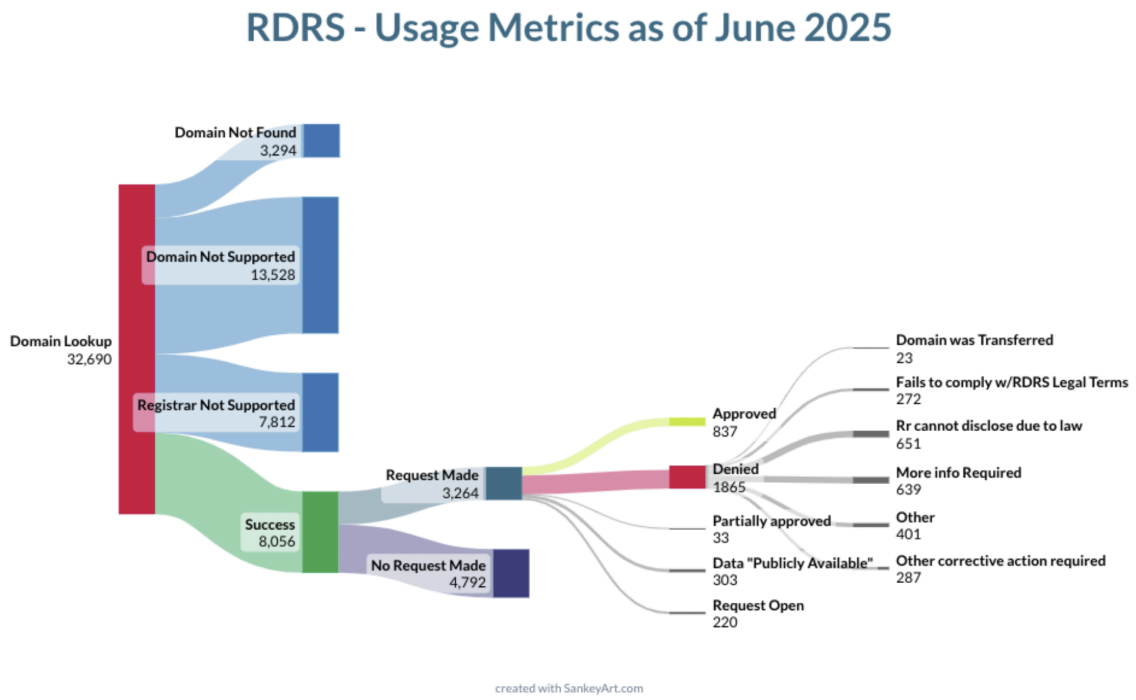
As part of its first assignment, the RDRS Standing Committee (SC) was tasked with reviewing data on a monthly basis to assess the functioning and usage of the RDRS pilot. To support this work, ICANN Org published detailed monthly reports, which the SC reviewed regularly and also presented to the GNSO Council as part of its ongoing updates. This consistent data review, combined with the SC's collective experience and insights gained from the operation of the RDRS, enabled the SC to fulfill its subsequent Assignments (Assignments 2 to 4) by developing informed findings and conclusions. These are reflected throughout this report. For reference and transparency, a comprehensive set of metrics covering the period from the pilot's launch through June 2025 is included in the Annex C.

The RDRS reports initially included 16 total metrics. Following feedback from the RDRS SC, ICANN org added four additional metrics. These include 6b - Use of Data Request Form for Participating Registrars, 17 - Number of Confidential Disclosure Requests, 18 - Disclosure Requests by Country Code and Request Category and 19 - Disclosure Requests by Processing Jurisdiction and Request Category.

RDRS Requests Start to Finish (Sankey Visualization), as of June 2025

The RDRS SC members have conducted additional analysis on the monthly RDRS reports published by ICANN. The graph below shows one such analysis, which was conducted to provide

a high-level graphical overview of the volume of RDRS requests and their relative final dispositions.



The 32,690 “Lookups” represent the number of times a domain name was entered into the RDRS lookup field. Since not all domains are serviceable by the RDRS, this number does not represent the number of times a disclosure request was made.

Of those 32,690 domains entered:

3,294 were “not found”, likely indicating typos or non-resolvable domains.
13,528 resolved to non-participating Top Level Domains (e.g. ccTLDs, or .gov, .mil, etc)
7,812 were gTLDs which resolved to registrars who were not voluntarily participating in the RDRS pilot (labelled “Registrar not Participating”)
8,056 were gTLDs which resolved to registrars who were voluntarily participating in the RDRS pilot. (labelled “Success”)

Setting aside the ~3k occasions in which unresolvable domains were input, the RDRS was able to process about ⅓ of the requests input by its users. The other ⅔ of the times RDRS users attempted to use the RDRS, the request could not be further processed, whether due to non-participating registrar or non-participating TLD.

Of the 8,056 requests which were able to proceed, only 3,264 (40%) resulted in requests being submitted. In determining why approximately 60% of initiated requests were not completed, the RDRS SC performed outreach and was informed that some requestors: (i) used the RDRS as a lookup tool and chose not to submit requests, and/or (ii) initiated a request(s) to determine the options available before making a determination on whether to submit a disclosure request, and/or (iii) experienced "user friction" with the RDRS form and ultimately chose to abandon

their request(s). While this list may not be exhaustive, it partially explains why a large percentage of initiated requests were not completed.

Annex A – RDRS SC Charter

ICANN | GNSO
Generic Names Supporting Organization

WG Name:	TBD	
Section I: Working Group Identification		
Chartering Organization(s):	Generic Names Supporting Organization (GNSO) Council	
Charter Approval Date:	21 September 2023	
Name of WG Leadership:	Sebastien Ducos, RDRS SC Chair	
Name(s) of Appointed Liaison(s):	<Enter Liaison>	
WG Workspace URL:	https://icann-community.atlassian.net/wiki/spaces/EOTSFGRD/pages/115682434/RDRS+Standing+Committee	
WG Mailing List:	https://lists.icann.org/hyperkitty/list/gnso-rdrs-sc@icann.org/	
GNSO Council Resolution:	**Title:**	Motion to adopt the Charter for a Registration Data Request Service (RDRS) Standing Committee to help inform the next steps on the SSAD policy recommendations
	Ref # & Link:	https://gnso.icann.org/en/council/resolutions/2020-current#202309
Important Document Links:	**Procedural Documents:** ● EPDP Phase 2 (SSAD) Final Report	
Section II: Mission, Purpose, and Deliverables		
Mission & Scope: On 3 December 2021, Philippe Fouquart shared an update on the GNSO Council mailing list, noting that the SSAD Operational Design Phase (ODP) Team was in the process of finalizing its analysis, including work related to the SSAD Cost Model. As such, and in connection with the Council's request for a		

consultation 1 with the ICANN Board related to concerns around financial sustainability, the next phase of that consultation was to be scheduled in January 2022.

Ahead of the January consultation, an update session for the Council and GNSO-appointed EPDP Team members was scheduled for 20 December 2021, focusing on the SSAD Cost Model information. During that meeting, the Council, GNSO-appointed EPDP Team members, and GDPR Board Caucus members discussed the findings from the Operational Design Assessment (presentation) and the implications on the viability of the SSAD. On 4 January 2022, Philippe Fouquart shared a summary paper capturing the different ideas and suggestions that were made during that meeting. The Council scheduled a follow-on call on Wednesday 12 January 2022 to determine if there was convergence within the Council on possible next steps (see recording, presentation as well as follow up email sent on 17th January 2022 with an updated SSAD ODP Next Steps document). While the Council received an early update, a general webinar on the SSAD ODP was held on 18 January 2022.

During its meeting on 20 January, the Council further considered procedural options (see slides), as well as the proposed approach for analyzing the Operational Design Assessment (ODA) which is seen as an essential step before making a determination about next steps. The Council considered a small team of Council members with the support of EPDP Team representatives to be best positioned to analyze the ODA and provide guidance to the Council on possible next steps.

The Council met with the ICANN Board on 27 January (see recording) as the next step in its consultation related to concerns around financial sustainability of the SSAD. In advance of that meeting, the ICANN Board sent the GNSO Council a letter outlining some of its concerns as well as questions it hoped to receive input on from the Council.

At the request of Council, the small team considered the ODA and whether it had correctly interpreted the intent of the SSAD recommendations as well as provided its views on the concerns identified by the ICANN Board and potential options that could be considered. This resulted in a preliminary report to the GNSO Council, which was supported by the GNSO Council. The small team also developed an addendum where it recommended and outlined a “proof of concept” approach to gather further data to help inform a decision on if/how to proceed with the SSAD recommendations. Following the Council’s support for this approach and request to the ICANN Board to proceed in this way, the ICANN Board directed ICANN org on 27 February to “proceed to develop and launch the System as soon as possible”. The ICANN Board also “directed ICANN org to continue to engage with the Phase 2 Small Team throughout the development and operation of the System, and ensure periodic publication of the collected usage data, once operational". On the recommendation of the small team, the Council submitted to the ICANN Board the proposed RDRS success criteria on 1 June 2023.

The Council also requested the small team to consider “the approach and format through which, following implementation of the system, data should be reviewed and analyzed to help inform subsequent decisions on how to proceed with the SSAD recommendations”. The small team has put forward this charter for an RDRS Standing Committee to help inform the next steps on the SSAD policy recommendations for the Council’s consideration.

Scope

The Standing Committee is tasked to review the data that will be produced by ICANN org on a monthly basis following the launch of the RDRS (see data points outlined here). The Scoping Team is expected to analyze the data and consider:

Assignment #1. Trends that can be identified over a month-by-month period;
Assignment #2. Possible technical updates* that should be considered to RDRS and/or related messaging and promotion (recognizing that the RDRS will only be running for a two-year period and limited resources may be available to implement such updates);
Assignment #3. Specific lessons learned that should be factored into the consideration of how to proceed with the SSAD recommendations;
Assignment #4. Suggestions to the Council for a proposed recommendation(s) to the ICANN Board in relation to the consideration of the SSAD recommendations**.

Although the monthly data reports are expected to be made available to the Council, it is not the expectation that the Standing Committee will provide a monthly analysis of this data to the Council as it may be necessary to review the data over a longer time period before certain conclusions can be drawn. As noted in the small team's addendum: "Any conclusions and/or recommendations stemming from this review, would be provided to the GNSO Council for a decision on further steps. Although the reports are expected to be provided on a monthly basis, in line with the preliminary report, the small team anticipates that any conclusions and/or recommendations in relation to the SSAD recommendations would only be developed after 6-month intervals, up to a maximum of two years, at which point a decision has to be taken on how to proceed (if a decision has not been made before that time). To be clear, although further enhancements may be considered by ICANN org based on the actual experience with the Whois Disclosure System once it is operational, it is not the intent or objective of the 6-month intervals to focus on technical enhancements for the Whois Disclosure System".

*Any requests to ICANN org for substantial updates requiring significant resources need to be reviewed and approved by the GNSO Council. If there is disagreement between the Standing Committee and ICANN org in relation to the technical updates requested, the Council liaison is expected to mediate, and escalate to the GNSO Council as deemed necessary.

** As noted in the small team's preliminary report: "As part of the checkpoint review, it would also be discussed what happens with the SSAD proof of concept once the 2-year period ends. The small team noted that it would not be prudent to decide this at the outset as it will depend on the take up and use of the SSAD proof of concept. However, while decisions are taken and/or until a replacement solution is agreed, the small team can envision maintaining the proof of concept tool online, in existing or modified format, if it is proven useful enough, noting that there will be cost implications associated with such a decision. The small team does expect that before the 2-year period ends clarity is provided on the expected next steps in relation to the EPDP Phase 2 SSAD Recommendations which could include: 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."

Deliverables: The Standing Committee shall establish its expected meeting cadence following its first meeting and shall consider how and how often it expects to communicate to the Council in relation to assignments #1 and #2 before it ultimately shares its expected reporting cadence with the Council. In relation to assignments #3 and #4, the Standing Committee may communicate findings and recommendations to the Council on an ongoing basis, but the expectation is that towards the end of the two-year period for which the RDRS will run, the Standing Committee will compile its findings and recommendations in relation to assignments #3 and #4 in the form of a report. The Standing Committee should consult with the GNSO Council on whether this report should be published for public comment. The Chair is expected to provide regular updates to the GNSO Council

on the status of work and timeline for implementation. This can be done in writing or through updates during Council meetings.

Section III: Formation, Staffing, and Organization

Membership:

The Standing Committee will consist of interested Council members and interested EPDP Phase 2 members that participated in the EPDP Phase 2 small team, as well as an ICANN Board liaison and an ICANN org liaison. To ensure continuity, Council members that have participated in the small team effort are allowed, if interested, to continue even after their term on Council has ended. Also, new Council members may join the Standing Committee but they will need to review and show demonstrated knowledge of previous discussions and documents on this topic. The Standing Committee members may identify alternates to take their place in case of absence. Such alternates are expected to have been part of the Standing Committee as observers to ensure that they are up to speed on the discussions.

- For the EPDP Phase 2 small team membership, see https://community.icann.org/x/EgciCw

On the suggestion of the Standing Committee, the Chair may invite external participants with specific expertise or knowledge to contribute to Standing Committee deliberations.

Note that the mailing list of the Standing Committee will be publicly archived. Calls are recorded and will be accessible to observers.

The GNSO Council will appoint a Chair for the Standing Committee.

GNSO Council Liaison

The GNSO Council shall appoint a liaison who is accountable to the GNSO. The liaison must be a member of the Council, and the Council recommends that the liaison should be a Council member and be able to serve during the life of this Standing Committee. The liaison shall review the Guidance documents below. Guidance: New Liaison Briefing and Liaison Handover & GNSO Council Liaison Supplemental Guidance

Support Staff:

The ICANN Staff assigned to the Standing Committee will fully support the work of the Standing Committee as requested by the Chair including meeting support, document drafting, editing and distribution and other substantive contributions when deemed appropriate. Staff assignments to the Working Group:

- GNSO Secretariat
- ICANN policy staff members

Section IV: Rules of Engagement

Statement of Interest (SOI) Guidelines:

Each member of the Standing Committee is required to submit an SOI in accordance with Section 5 of the GNSO Operating Procedures.

Problem/Issue Escalation & Resolution Process:

Please reference Sections 3.4 and 3.5 of the Working Group Guidelines and the Guidance document below.

Guidance: Guidelines Concerning ICANN Org Resources for Conflict Resolution and Mediation

Formal Complaint Process:

Leadership Structure:

Leadership Criteria:

Leadership Review:

The WG leadership shall review the full text of Regular Review of Working Group Leadership document to understand the regular review of WG leadership performance by the GNSO Council, as well as the member survey that feeds into the review. This leadership review may be conducted alongside the WG self-assessment, or be integrated as part of the WG self-assessment based on the GNSO Council's further improvement of the review mechanism.

GNSO Council Liaison

The GNSO Council shall appoint one (1) Liaison who is accountable to the GNSO. The Liaison must be a member of the Council, and the Council recommends that the Liaison should be a Council member and be able to serve during the life of this WG.

Support Staff:

The ICANN Staff assigned to the WG will fully support the work of the Working Group as requested by the Chair including meeting support, document drafting, editing and distribution and other substantive contributions when deemed appropriate.

Section IV: Rules of Engagement

Statements of Interest (SOI) Guidelines:

Each member of the WG is required to submit an SOI in accordance with Section 5 of the GNSO Operating Procedures.

Problem/Issue Escalation & Resolution Process:

Please reference Sections 3.4 and 3.5 of the Working Group Guidelines and the Guidance document below.

Guidance:
https://gnso.icann.org/sites/default/files/file/field-file-attach/pdp-3-15-icann-resources-conflict-resolution-mediation-10feb20-en.pdf

Formal Complaint Process:

Please reference Section 3.7 of the Working Group Guidelines and the Guidance document below. The Complaint Process may be modified by the GNSO Council at its discretion.

Guidance:
https://gnso.icann.org/sites/default/files/file/field-file-attach/pdp-3-9-clarification-complaint-process-10feb20-en.pdf

Section V: Decision Making Methodologies

Consensus Designation Process:

Section 3.6 of the GNSO Working Group Guidelines, as included below, provides the standard consensus-based methodology for decision making in GNSO WGs. The Standing Committee is only expected to apply this decision-making methodology for recommendations stemming from assignment #4, if the recommendations do not achieve full consensus. For the other assignments, the Standing Committee is expected to document if there are different views or positions and indicate by whom those views / positions are held.

Standing Committee Self Assessment & Termination or Closure of Working Group:

The Standing Committee will close upon completion of its assignments, unless assigned additional tasks or follow-up by the GNSO Council. Following the completion of its assignments, a closure self-assessment will be conducted.

The GNSO Council may terminate or suspend the Standing Committee prior to the finalization of its assignments for significant cause such as changing or lack of community volunteers, the planned outcome for the project can no longer be realized, or when it is clear that no consensus can be achieved.

Section VIII: Charter Document History

Version	Date	Description
1.0	25 April 2023	

Staff Contact:	Feodora Hamza	Email:	Policy-Staff@icann.org

Translations: If translations will be provided please indicate the languages below:

Annex B – Consensus Designations

Below is the RDRS SC Chair's designation as to the level of consensus on each recommendation in this Findings Report. These designations were made following the process as outlined in the message to the RDRS SC mailing list on 11 August 2025, and in accordance with Section 3.6 - Standard Methodology for Making Decisions of the GNSO Working Group Guidelines.[10] By 15 August 00:00 UTC, three objections were received for recommendation #5.[11]

Recommendation #	Leadership Team's Proposed Designation
RDRS SC Charter Section V	
Recommendation 1: Continue the RDRS beyond the pilot period	Consensus
Recommendation 2: Allow for authentication of interested requestor groups, beginning with law enforcement.	Full Consensus
Recommendation 3: Implement Key System Enhancements to sustain and evolve RDRS post-pilot while more policy work is underway. (API, UX Redesign, optional ccTLD participation.	Full Consensus
Recommendation 4: Consider further policy work in the following areas: Privacy/Proxy Data, Inclusion of RDRS links in the RDAP responses.	Full Consensus
Recommendation 5: Consideration regarding next steps on EPDP Phase 2/SSAD Policy Recommendations.	Consensus
Recommendation 6: Maintain the current Standing Committee with narrowed Scope.	Full Consensus

[10] ANNEX 1: GNSO Working Group Guidelines: https://gnso.icann.org/sites/default/files/filefield_23493/annex-1-gnso-wg-guidelines-07apr11-en.pdf

[11] Comments received on Rec#5 https://gnso.icann.org/sites/default/files/policy/2025/draft/rdrs-sc-findings-report-comments-on-rec5-18aug25-en.pdf

Annex C – Assignment 1 - Metrics

Introduction

ICANN launched the Registration Data Request Service (RDRS) on 28 November 2023 with the intention to operate the service for up to two years. This is a result of the ICANN Board's direction to pursue usage and demand analysis of the system that handles requests for nonpublic registration data. The purpose of the RDRS is 1) to collect system usage data to inform the future discussion between the Generic Names Supporting Organization (GNSO) Council and the ICANN Board on the currently paused Policy Recommendations outlined in the Final Report of the GNSO Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Phase 2, and 2) to provide a cost-effective system that will simplify the process for submitting and receiving requests for nonpublic generic top-level domain (gTLD) registration data for both the requestors and registrars.

This monthly report provides the system usage data as requested by the GNSO Council. Current and past reports can be found on the RDRS webpage on ICANN.org.

Summary of Data

The table below gives a high-level summary of RDRS metrics. Each metric is further defined later in this report. To view those metrics, click the corresponding link for each reporting criterion. RDRS metrics are tracked based on request submission dates or decision dates, and reflect live data on the report export date.

#	Title/Reporting Criteria	Latest Reporting Period (June 2025)	Total
1 & 2	Number of registrars participating	1	78
3 & 4	Number of requestors	364	11,181
5	Number of disclosure requests	68	3,264
6.1	Number of times the data request form for non-participating registrars has been used	10	879
6.2	Number of times the data request form for participating registrars has been used	26	1,679
7	Number of disclosure requests by priority	See below	
7.1/7.2	Number of disclosure requests by Expedited priority	4	147
7.3/7.4	Number of disclosure requests by Standard priority	64	3,117
7.5/7.6	Number of disclosure requests changed from Expedited to Standard	3	140
7.7/7.8	Number of disclosure requests changed from Standard to Expedited	0	0

8	Number of disclosure requests by request type	See below	
8.1/8.12	Computer Security Incident Response Team (CSIRT)	0	35
8.2/8.13	Consumer Protection	0	234
8.3/8.14	Cybersecurity Incident Response Team (non-CSIRT)	1	33
8.4/8.15	Dispute Resolution Service Provider	2	35
8.5/8.16	Domain Investor	1	90
8.6/8.17	IP Holder	31	1058
8.7/8.18	Law Enforcement	7	496
8.8/8.19	Litigation/Dispute Resolution (non-IP)	3	128
8.9/8.20	Research (non-security)	12	162
8.10/8.21	Security Researcher	2	111
8.11/8.22	Other current reporting period and (total)	9	882
9	Number of disclosure requests by requestor	See below	
10	Number of domain lookups	See below	
11	Number of open disclosure requests	N/A	220
12	Number of closed disclosure requests	28	3,038
13	Number of closed disclosure requests by outcome type	See below	
13.1/13.5	Approved	17	837
13.2/13.6	Denied	9	1865
13.3/13.7	Partially Approved	0	33
13.4/13.8	Data Publicly Available	2	303
14	Denial rate by reason type	See below	
14.1/14.8	Domain name was transferred to another registrar/is not managed by the registrar identified in the request (change of control, domain hopping, etc.)	0	23
14.2/14.9	Requested data is publicly available in RDDS	0	1
14.3/14.10	The request fails to comply with any provision of the RDRS legal terms	3	272
14.4/14.11	Contracted party cannot disclose the data due to applicable law	0	651

14.5/14.12	Request is incomplete/more information is required before the request can be processed/requestor did not respond to request for additional information	4	639
14.6/14.13	Other corrective action is required before request can be processed	0	287
14.7/14.14	Other	2	401
15	Average disclosure request response time in days, broken out by outcome	See below	
15.1/15.5	Approved	28.94	7.67
15.2/15.6	Denied	15.44	16.4
15.3/15.7	Partially Approved	0	10.64
15.4/15.8	Data Publicly Available	3	8.72
16	Response time distribution	See below	
17	Number of confidential disclosure requests	6	413
18	Disclosure Requests by Country Code and Request Category	See below	
19	Disclosure Requests by Processing Jurisdiction and Request Category	See below	

User Data

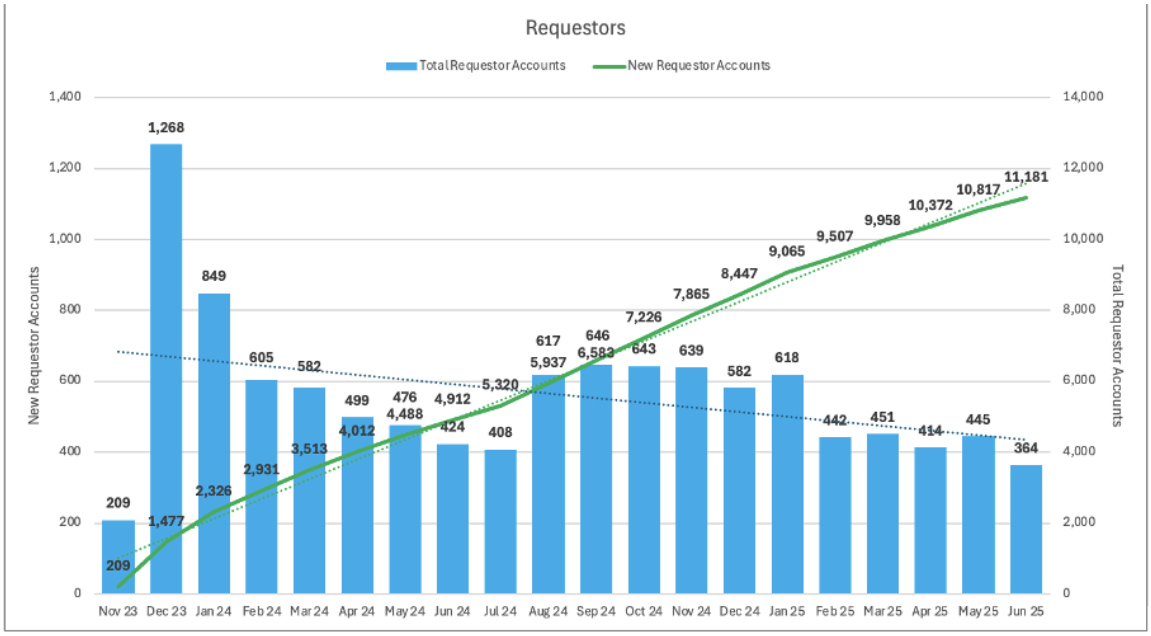
Metrics 1 and 2: Participating Registrars

Metric 2 indicates the number of registrars who have opted in during the reporting period. Registrars may opt in and out of the service at any time.

Metric 1: Number of registrars participating (total)	78
Metric 2: Number of registrar opt-ins (current reporting period)	1

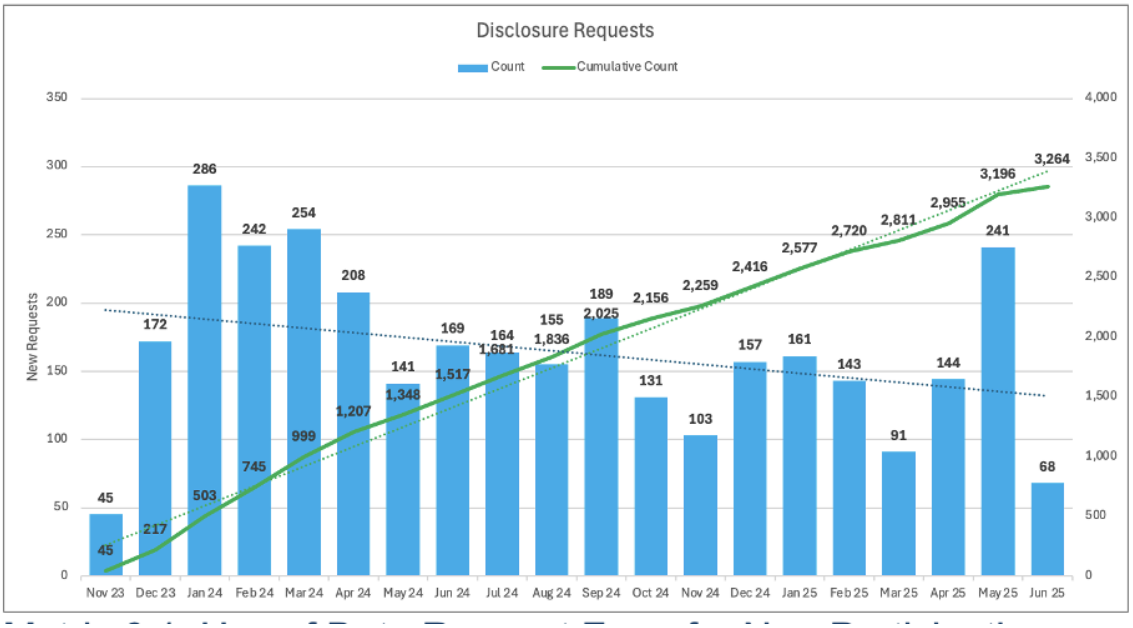
Metrics 3 and 4: Requestors

The chart below displays the monthly trend of the number of total and new requestors. The dotted lines represent trends within the data series.



Metric 5: Disclosure Requests

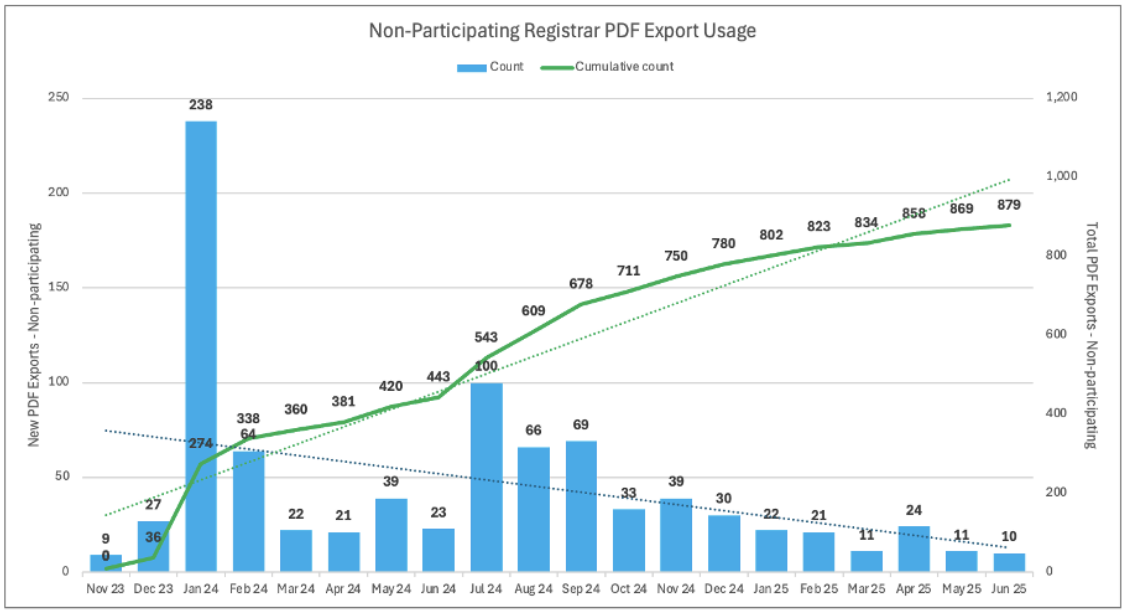
The chart below displays the trend of the number of disclosure requests that were submitted to participating registrars (since system launch and monthly). The dotted lines represent trends within the data series.



Metric 6.1: Use of Data Request Form for Non-Participating Registrars

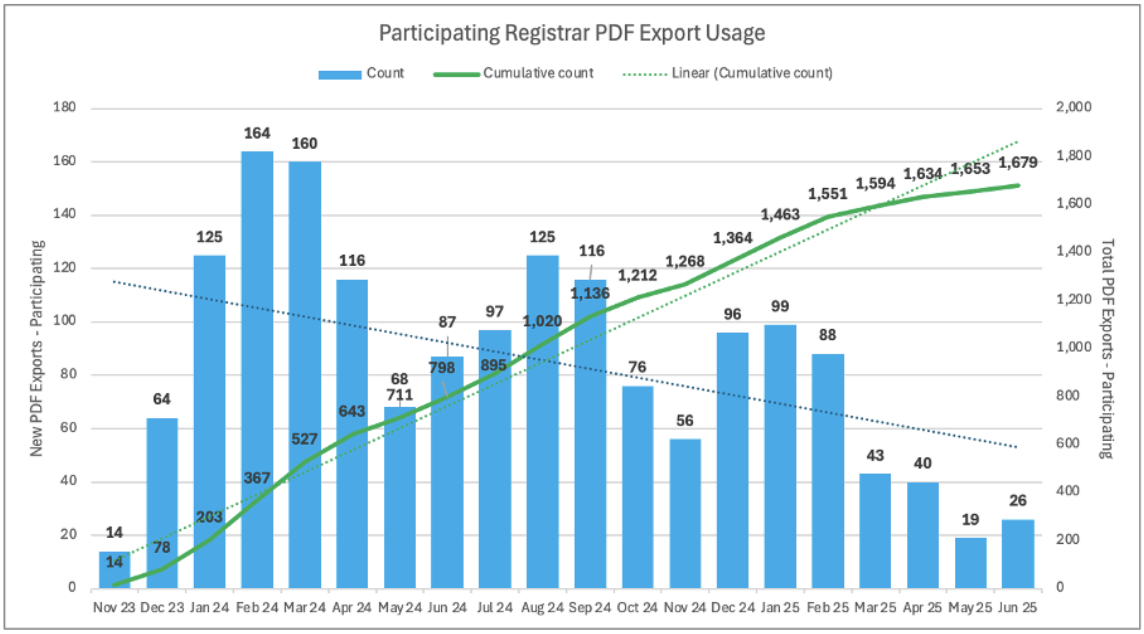
The chart below displays the trend of the number of times the data request form for non-participating registrars has been used (since system launch and monthly). Please note that

this data is calculated based on the number of times the “export PDF” function was used for when the domain name is managed by the non-participating registrar. The RDRS is not used to track how the form is used after download (e.g., whether it was directly sent to the registrar or not). The dotted line represents the trend within the data series.



Metric 6.2: Use of Data Request Form for Participating Registrars

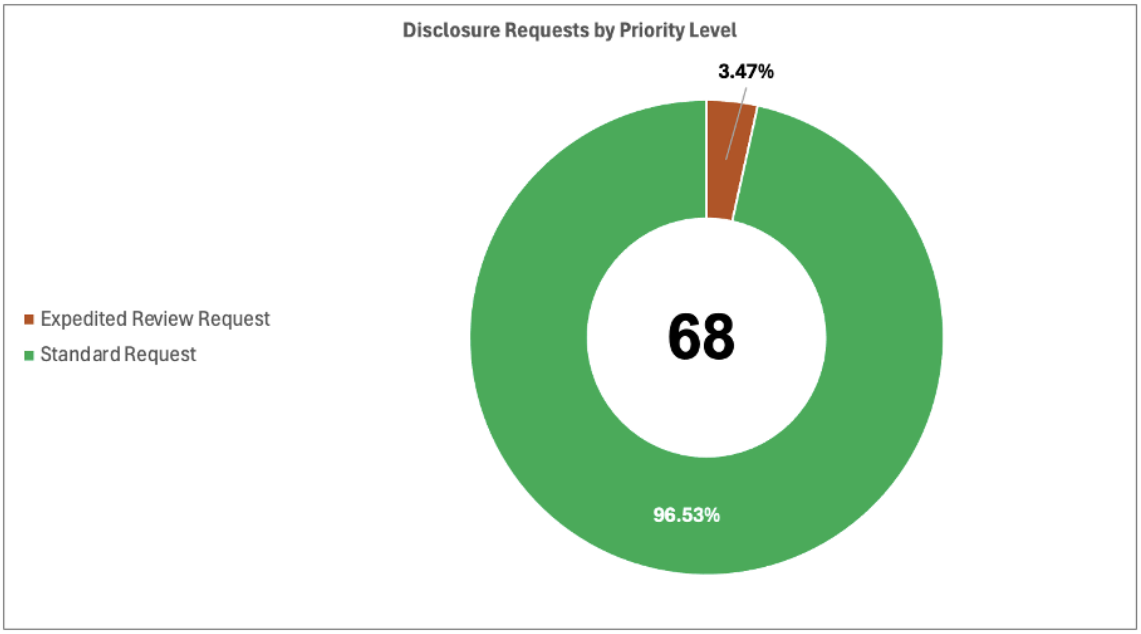
The chart below displays the trend of the number of times the data request form for participating registrars has been used since system launch and monthly. Please note that this data is calculated based on the number of times the “export PDF” function was used when the domain name is managed by the participating registrar. The RDRS is not used to track how the form is used after download (e.g., whether it was directly sent to the registrar or not). The dotted line represents the trend within the data series.



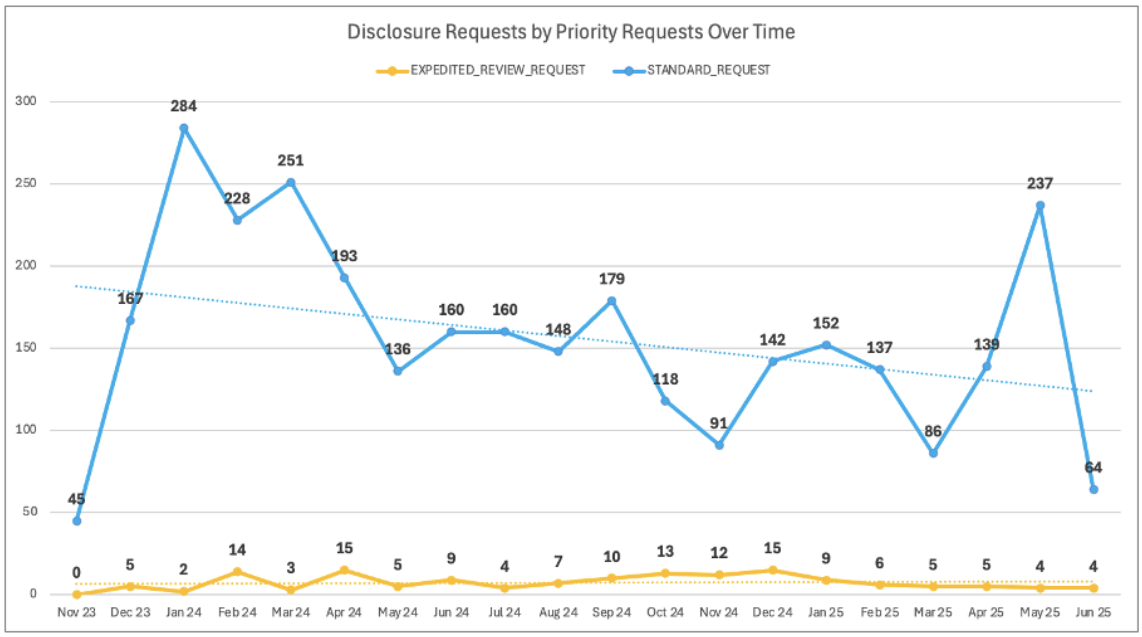
Request Type Data

Metric 7: Disclosure Requests by Priority Level

The chart below displays the total number of disclosure requests by priority level (expedited versus standard) in the reporting period (June 2025).



The chart below displays the monthly breakdown of disclosure requests by priority level (expedited versus standard) after the registrar made any changes to priority level status.



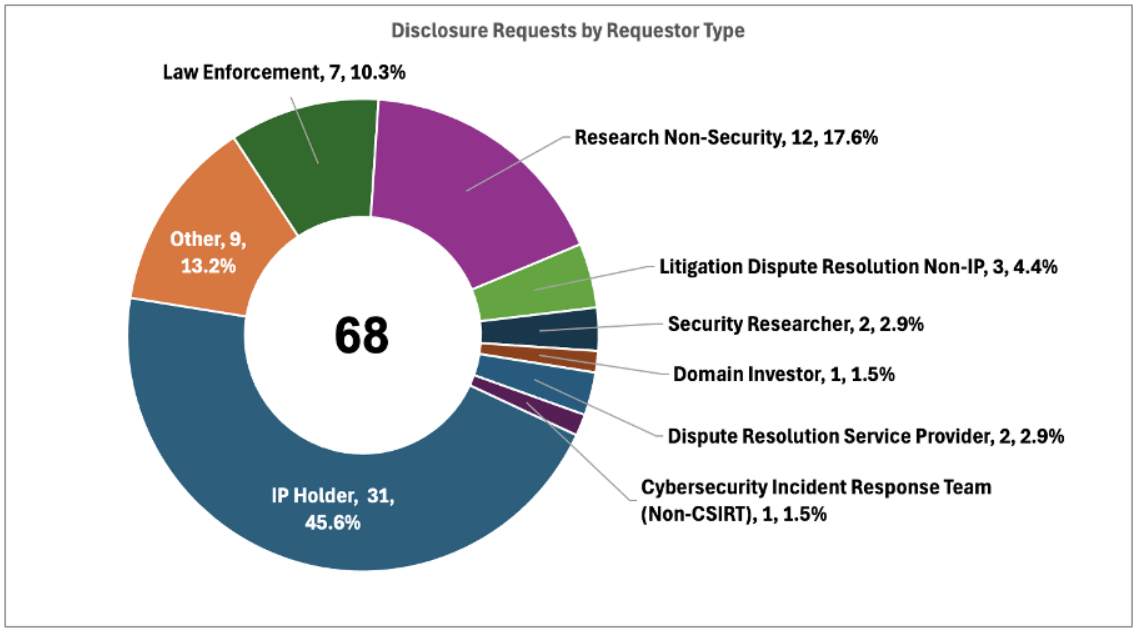
The chart below displays the number of priority level changes made by registrars for disclosure requests each month.

Disclosure Request Priority Changes		
Reporting Month	**Changed from Expedited to Standard**	**Changed from Standard to Expedited**
Nov-23	N/A	N/A
Dec-23	9	0
Jan-24	22	0
Feb-24	7	0
Mar-24	4	0
Apr-24	8	0
May-24	5	0
Jun-24	4	0
Jul-24	4	0
Aug-24	4	0
Sep-24	17	0
Oct-24	8	0
Nov-24	8	0
Dec-24	3	0
Jan-25	4	0
Feb-25	6	0
Mar-25	2	0
Apr-25	2	0
May-25	20	0

Jun-25	3	0

Metric 8: Disclosure Requests by Request Type

The chart below displays the total number of disclosure requests by request type within the reporting period (June 2025) and the percentage of total for each request type.



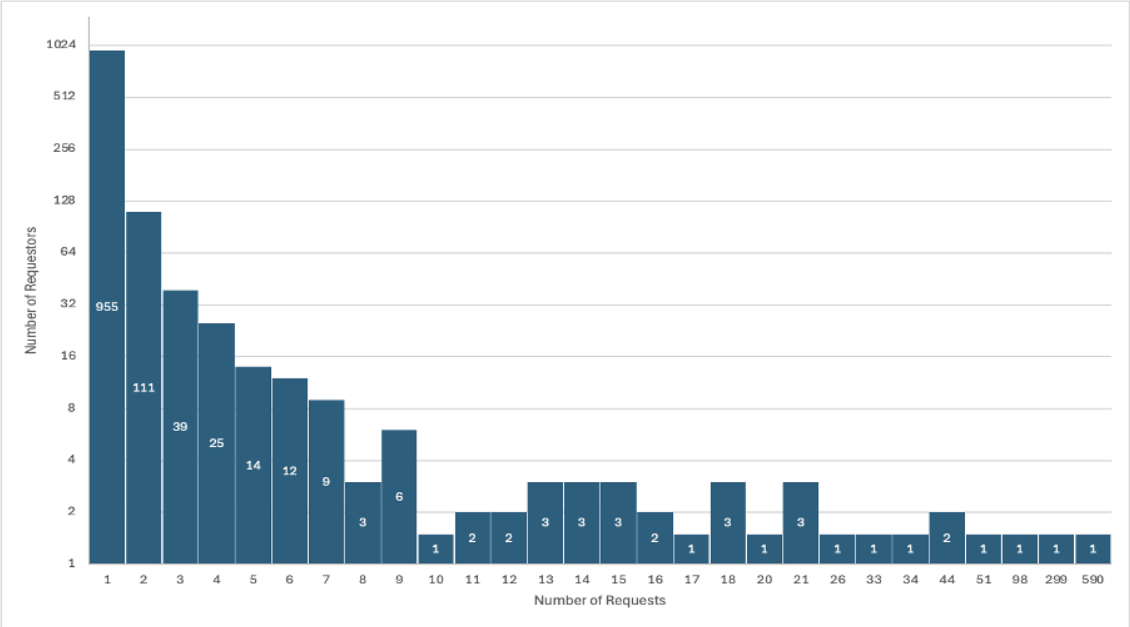
The table below displays the monthly counts and totals, expressed as both numbers and percentages, of disclosure requests by request type. Note that totals include canceled requests that are not reflected in the summary table totals.

Request Type	2023		2024												2025						Total	Total %
	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun		
IP Holder	20	49	107	116	71	43	35	49	66	24	35	23	33	29	39	36	26	33	193	31	1058	32.4%
Other	8	23	14	57	112	83	31	38	65	83	72	45	16	64	59	52	28	11	12	9	882	27.0%
Law Enforcement	1	17	38	30	25	45	38	49	20	7	32	27	19	8	8	27	18	69	11	7	496	15.2%
Consumer Protection	4	12	51	6	18	10	10	11	5	15	12	4	13	14	25	5	3	12	4	0	234	7.2%
Research (non-security)	8	13	16	5	8	8	1	3	1	7	12	7	10	17	8	13	3	5	5	12	162	5.0%
Litigation/Dispute Resolution (non-IP)	1	5	26	3	1	1	18	11	0	6	9	10	2	8	8	0	3	7	6	3	128	3.9%
Security Researcher	2	31	15	14	8	3	2	2	1	3	4	5	2	3	2	3	5	2	2	2	111	3.4%
Domain Investor	1	9	8	3	5	4	2	4	1	6	10	5	5	10	8	1	1	3	3	1	90	2.8%
Computer Security Incident Response Team (CSIRT)	0	8	6	3	2	1	2	1	4	1	0	0	0	3	0	0	1	1	2	0	35	1.1%
Dispute Resolution Service Provider	0	2	3	4	1	6	1	0	0	3	3	1	2	1	2	0	2	1	1	2	35	1.1%

Cybersecurity Incident Response Team (non-CSIRT)	0	3	2	1	3	4	1	1	1	0	0	4	1	0	2	6	1	0	2	1	33	1.0%
Total	45	172	286	242	254	208	141	169	164	155	189	131	103	157	161	143	91	144	241	68	3264	100%

Metric 9: Disclosure Requests by Requestor

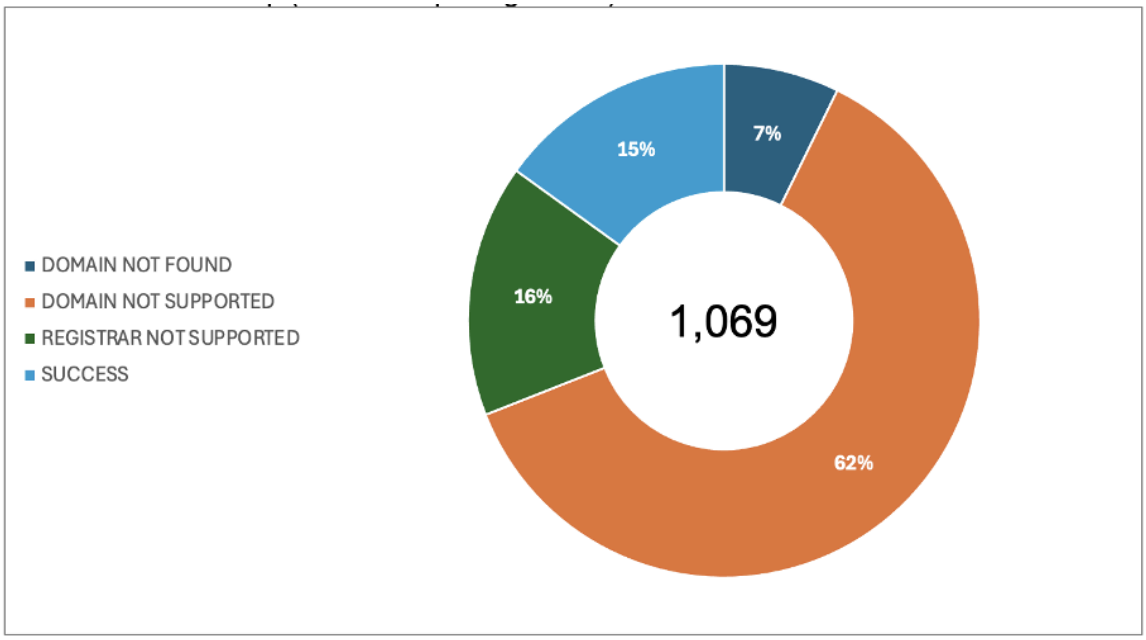
The chart below displays a histogram of the number of requests since system launch by requestor. This histogram provides a distribution of the number of requestors who made a range of requests. Histograms use binning, which creates defined ranges for comparison. In this case, these ranges are defined by the number of requests made by a group of requestors. Each column shows how many requestors submitted a specific number of, or range of requests.



Metric 10: Number of Domain Lookups

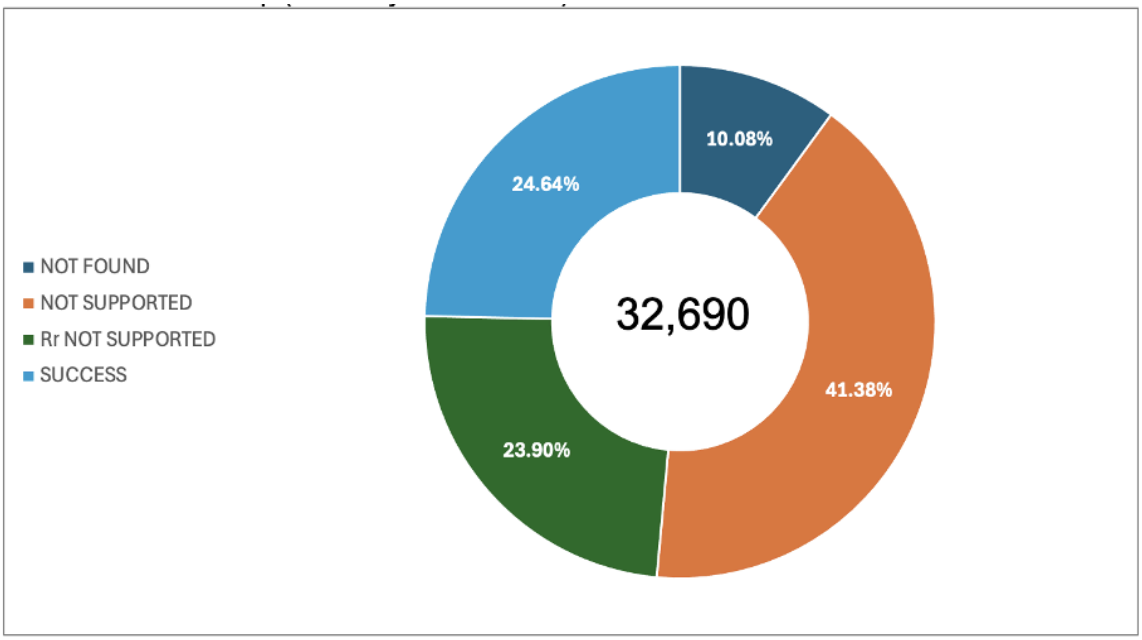
The charts below display the total number of domain lookups during the current period and since the November 2023 launch, monthly lookup trends and numeric breakdown of lookup results. “Domain Not Found” means the domain name format was entered correctly, but does not exist when the Registration Data Directory Services (RDDS) is queried (e.g., the domain name is not registered). “Domain not supported” indicates the domain name entered is for a top-level domain that is not in the gTLDs JSON Report and/or has an invalid format (e.g., “sample” or “company name LLC”). “Registrar not supported” means that the registrars managing the domain names are not participating in the RDRS. “Success” means that the lookup was for an existing gTLD domain name that is managed by participating ICANN-accredited registrars. Additionally, the total number of “success” lookups will not match the number of request submissions (Metric 5) as users may look up a domain but not proceed to submitting a request.

Metric 10: Domain Lookup (Current Reporting Period - June 2025)

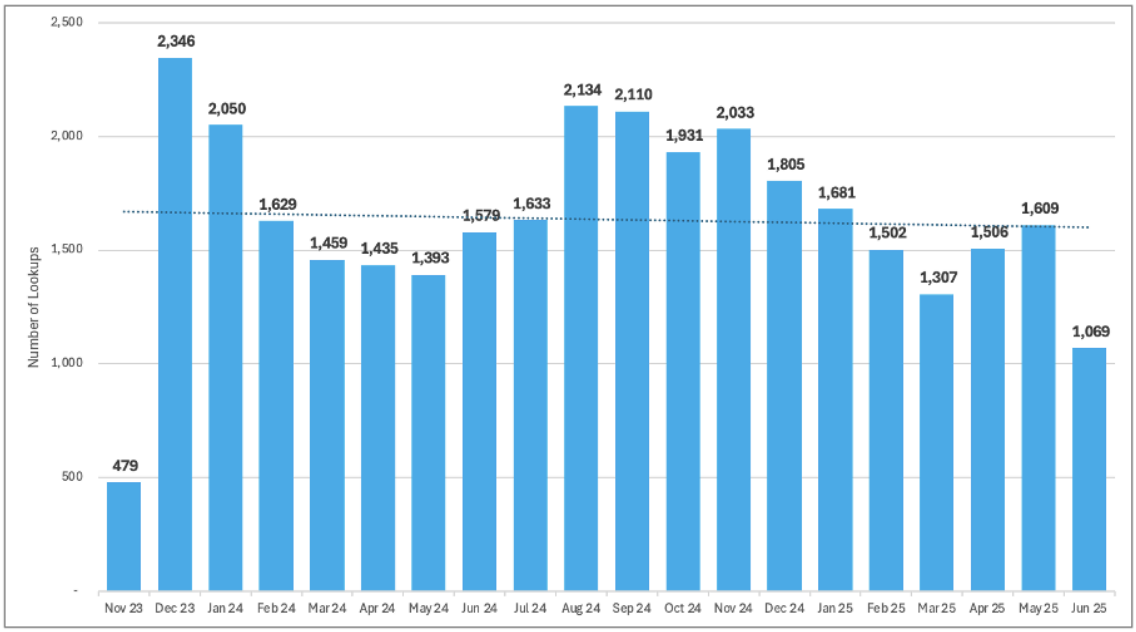


Metric 10: Domain Lookup (Since System Launch)

The chart below displays the monthly breakdown of total domain lookups. The dotted line represents the trend within the data series.



Metric 10: Domain Lookups Over Time



Metric 10: Domain Lookup Response by Month

Month	DOMAIN NOT FOUND		DOMAIN NOT SUPPORTED		REGISTRAR NOT SUPPORTED		SUCCESS		Total
November 2023	98	20%	33	7%	189	39%	159	33%	479
December 2023	465	20%	506	22%	697	30%	678	29%	2,346
January 2024	323	16%	348	17%	661	32%	718	35%	2,050
February 2024	204	13%	303	19%	533	33%	589	36%	1,629
March 2024	181	12%	282	19%	501	34%	495	34%	1,459
April 2024	159	11%	392	27%	443	31%	441	31%	1,435
May 2024	89	6%	644	46%	314	23%	346	25%	1,393
June 2024	134	8%	689	44%	368	23%	388	25%	1,579
July 2024	96	6%	658	40%	455	28%	424	26%	1,633
August 2024	192	9%	1115	52%	332	16%	495	23%	2,134
September 2024	179	8%	995	47%	431	20%	505	24%	2,110
October 2024	137	7%	987	51%	417	22%	390	20%	1,931
November 2024	148	7%	894	44%	660	32%	331	16%	2,033
December 2024	197	11%	976	54%	289	16%	343	19%	1,805

January 2025	124	7%	910	54%	304	18%	343	20%	1,681
February 2025	134	9%	775	52%	250	17%	343	23%	1,502
March 2025	114	9%	716	55%	250	19%	227	17%	1,307
April 2025	128	8%	796	53%	296	20%	286	19%	1,506
May 2025	114	7%	849	53%	252	16%	394	24%	1,609
June 2025	78	7%	660	62%	170	16%	161	15%	1,069
Total	**3,294**	**10.1%**	**13,528**	**41.4%**	**7,812**	**23.9%**	**8,056**	**24.6%**	**32,690**

Request Transactional Data

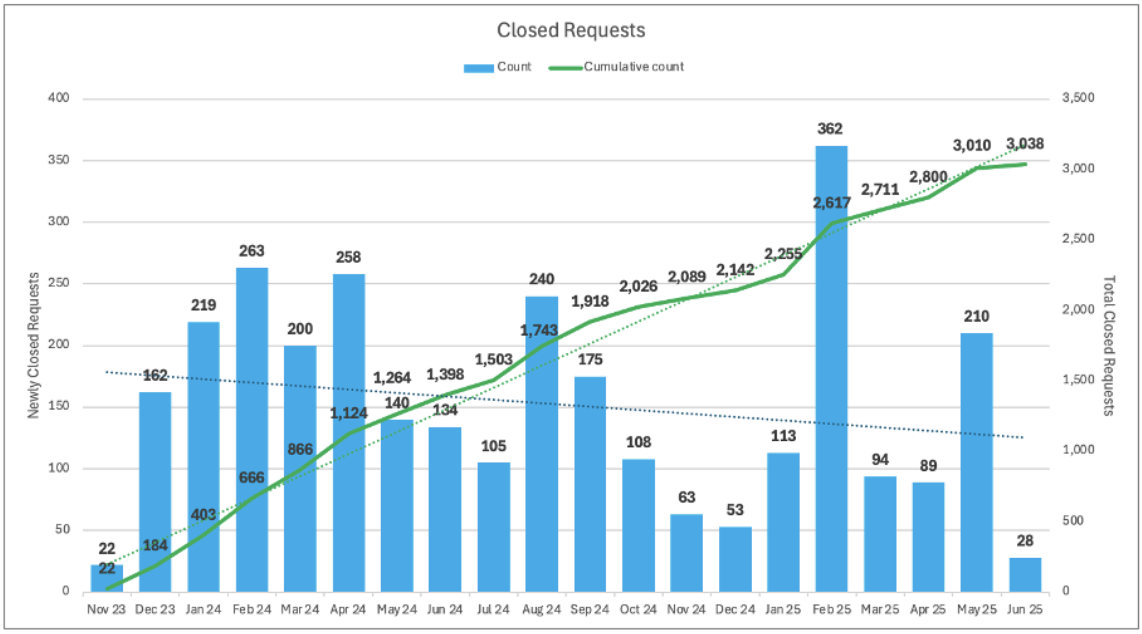
Metric 11: Open Requests

The table below displays the current number of open disclosure requests as of the date of this report. Please note that open disclosure requests indicate the registrar has not logged a final response yet, and includes requests for registrars that have opted out of participating in the pilot.

Current number of open disclosure requests (as of the date of this report):	220

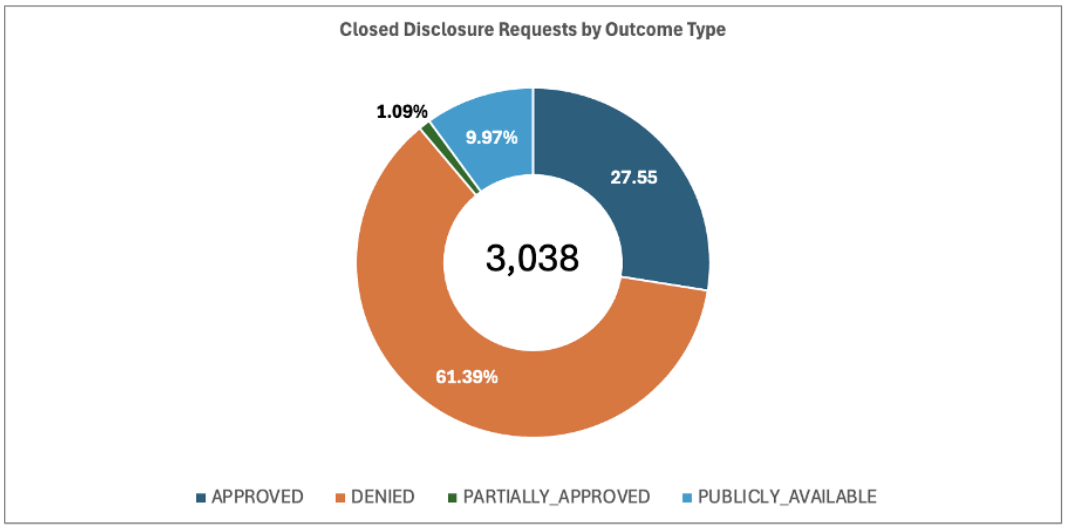
Metric 12: Closed Requests

The chart below displays the trend of the number of closed disclosure requests since the system launched and monthly. The dotted lines represent the trends within the data series.

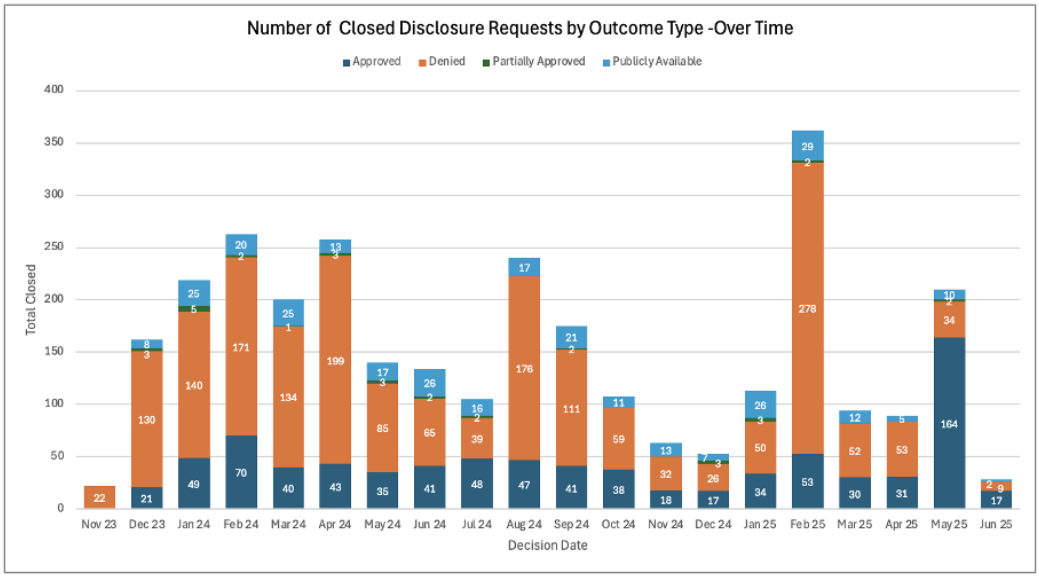


Metric 13: Number of Closed Disclosure Requests by Outcome Type

The chart below displays the total number of closed disclosure requests by outcome type (approved, partial approval, denied, and data publicly available) since the system launched. Publicly Available outcomes means that the registrar neither denied nor approved the data request, because all requested data is already publicly available. The reasons for the data being publicly available include, but are not limited to, the registrant's jurisdiction, registrant's choice, or the use of a privacy or proxy service provider. Denial outcomes include many different reasons, such as incomplete or invalid requests, resulting in the registrar unable to assess the request. For more information, refer to Metric 14.



Metric 13 Continued: The chart below displays the monthly breakdown of closed disclosure requests by outcome type (approved, partial approval, denied, and data publicly available).



Outcome Data

Metric 14: Denial Rate by Reason Type

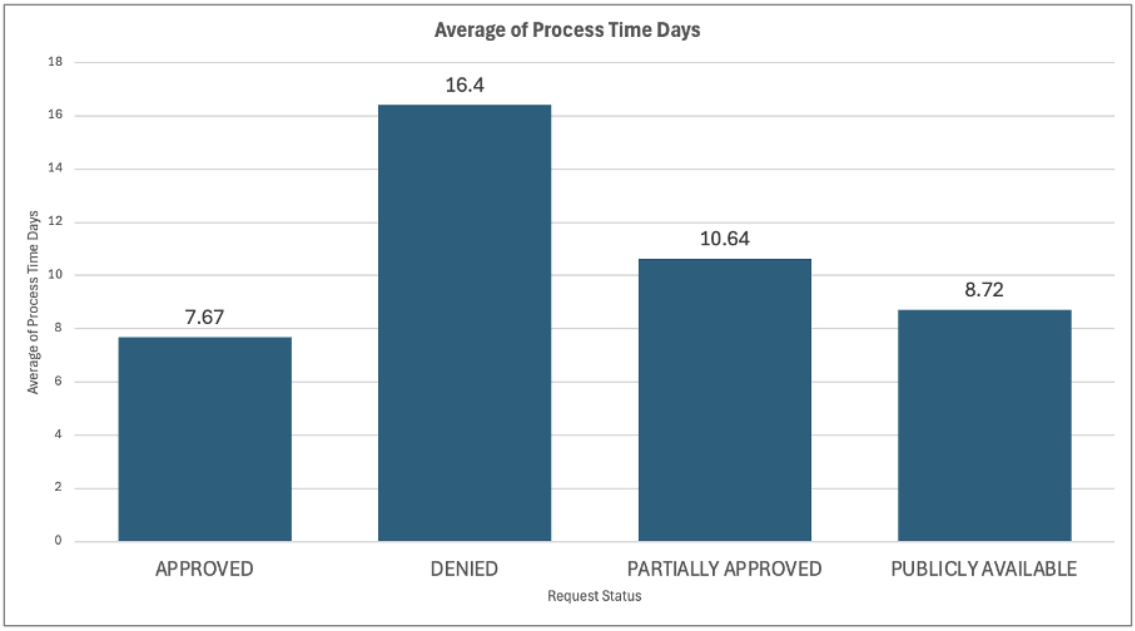
The chart below displays the monthly breakdown of denial rate since the system launched by reason type, along with the total count. Please note that multiple denial reasons can be selected for each request. RDRS received many test request submissions during the pilot's launch. Those submissions resulted in denials and are included in the total counts below.

Reason Type	2023		2024												2025						Total
	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	
Contracted party cannot disclose the data due to applicable law	0	60	55	50	53	38	55	40	27	30	30	26	12	24	33	48	15	34	21	0	**651**
Request is incomplete/more information is required before the request can be processed/requestor did not respond to request for additional information	8	21	30	27	55	128	11	20	8	125	62	2	5	1	6	105	16	4	1	4	**639**
Other	10	31	24	33	16	14	30	17	17	31	25	6	16	2	7	96	12	5	7	2	**401**
Other corrective action is	8	38	42	68	42	11	1	6	2	2	4	0	0	0	1	58	4	0	0	0	**287**

required before request can be processed																					
The request fails to comply with any provision of the RDRS legal terms	1	8	23	12	17	16	28	11	11	19	18	31	3	4	7	34	9	10	7	3	**272**
Domain name was transferred to another registrar / is not managed by the registrar identified in the request (change of control, domain hopping, etc.)	0	0	1	1	1	3	2	0	0	1	2	1	0	0	0	11	0	0	0	0	**23**
Requested data is publicly available in RDDS	0	0	0	0	0	0	0	0	0	0	0	1	0	0	0	0	0	0	0	0	**1**

Metric 15: Average Disclosure Request Response Time (in days)

The chart below displays the average disclosure response time since the system launched, in days, by outcome type (approved, partially approved, denied, and data publicly available).



The table below displays the monthly breakdown of the average disclosure response time, in days, by outcome type (approved, denied, partially approved, and data publicly available). Note previous months' data is not updated; only the current month is added as it represents the data at the time of report generation.

Month	Approved	Denied	Partially Approved	Publicly Available
Nov/Dec 2023	4.2	1.97	14.5	1.13
January 2024	3.89	2.88	8	4.48
February 2024	6.92	2.62	1.5	1.65
March 2024	5.76	6.17	110	8.83
April 2024	14.09	11.26	22.67	1.85
May 2024	11.34	9.77	3.5	4.88
June 2024	6.59	19.46	2.5	0.5
July 2024	9.3	10.7	2.5	2.44
August 2024	1.94	18.77	0	6.53
September 2024	5.86	6.57	5	0.9
October 2024	3.41	41.96	0	0.11
November 2024	8.46	23.88	0	2.08

December 2024	6.29	4.9	1.67	0.71
January 2025	11.61	7.82	21.67	6.19
February 2025	30.36	58.38	1	58.97
March 2025	3.3	7.37	0	3.67
April 2025	1.48	3.92	1	2
May 2025	23.8	20.56	1.5	2.2
June 2025	28.94	15.44	0	3

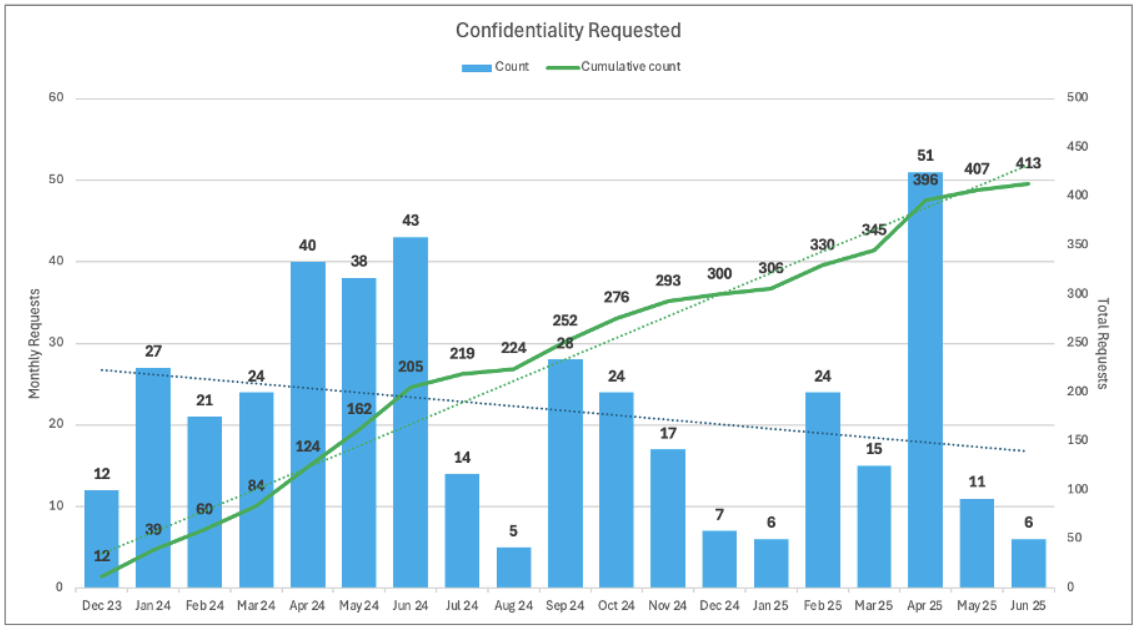
Metric 16: Response Time Distribution

The table below displays the response time distribution (10th, 30th, 50th, 70th, and 90th percentiles, with the 50th percentile being the median), including the time from when the request was submitted until the time the request was addressed, differentiating between request status. Values are representative of the number of days.

Request Status	10th %	30th %	Median	70th %	90th %	Average
Approved	0	1	2	5	21	7.82
Denied	0	1	4	12	54	16.4
Partially Approved	1	2	3	8	23.2	10.64
Publicly Available	0	0	1	3	21.8	8.72

Metric 17: Number of Confidential Disclosure Requests

The chart below displays the trend of the number of times the “requesting confidentiality” box was selected since the system launched. The confidentiality box is only available for those requestors who indicate their request category to be “law enforcement.”



Metric 18: Disclosure Requests by Country Code and Request Category

The chart below displays the number of disclosure requests by request category and country code submitted for nonpublic gTLD registration data through RDRS. Requestors may select from 250 country codes when submitting a request. See the RDRS Usage Metrics Reports section for the downloadable CSV format.

The data shown for this metric is cumulative and tracking began in June 2024.

Note: Each request category is selected at the requestor's discretion. A requestor selecting the law enforcement request category does not necessarily indicate that the requestor works for a law enforcement agency. RDRS does not include an authentication mechanism to verify whether requests come from law enforcement authorities or any other category available for selection. Furthermore, ICANN is not the final recipient of these disclosure requests and does not evaluate or make determinations regarding the assertions made in individual requests. All requests are forwarded to the appropriate registrar for evaluation.

Country Code	Computer Security Incident Response Team CSIRT	Consumer Protection	Cybersecurity Incident Response Team Non-CSIRT	Dispute Resolution Service Provider	Domain Investor	IP Holder	Law Enforcement	Litigation Dispute Resolution Non-IP	Other	Research Non-Security	Security Researcher	Total
ae					1		1				1	3
af									1			1
ar		1					2		2			5
at						3						3

au	1	2				4	2		4			13
ba					1		1					2
bd		1		1			2			1		5
be		1			1	5	1		2			10
bg		1								1		2
br				1		3	17		6			27
bt	1											1
ca					1	6	5		5	3	1	21
ch					1	4	3	2		1	1	12
cl						1						1
cn		1	1	4		2	1	2	8	1	1	21
co		1			2	1	2					6
cy							5					5
cz						1						1
de	3	1		1	5	21	5		8	3		47
dk			6			2	1	1	2			12
ec	1				1							2
eg		1										1
es						7		2	6		1	16
et		1							1			2
fi									1			1
fr	1					64	6	2	11		2	86
gr							3					3
hk						1		3	1			5
hu					1					1		2
id	1	1				1			1	1	1	6
ie		1							1			2
in				2	3	7	1	3	4	2	1	23
ir					1							1
is											1	1
it		1				11	3		3	1		19
jp						3	1			19		23
ke					1							1
kp					2							2
kr							1					1
ky						1						1
kz							1					1
lk										1		1
lt								1	2			3
lu						1	3	2				6
ma					1			1			1	3

ml							1					1
mt						1	12					13
mv			1									1
mx		1		1	2				2		1	7
my		1							1	1		3
ng						1						1
nl		1	1	1		6	1	1	5		2	18
no									1			1
np									1			1
nz						1			1			2
pa									1			1
pg					2							2
ph				1								1
pl						5	4			1		10
pt						1	20					21
qa									3			3
ro										1		1
rs						6				1		7
ru						1						1
sa					2							2
se						3	2		3			8
sg				1		2			1			4
sk						1				1		2
sr	1				1						1	3
th							1		1			2
tr				2	1	1			5		2	11
ua									1		1	2
ug									1			1
uk		1	3	1		23	53	8	16	3		108
us	3	94	6	2	23	372	90	33	433	55	16	1127
uz										1		1
vn		1			1		4			1		7
ye								1				1
za						1						1
Total	**12**	**113**	**18**	**18**	**54**	**574**	**255**	**62**	**545**	**100**	**34**	**1785**

Metric 19: Disclosure Requests by Processing Jurisdiction and Request Category

The chart below displays the total number of disclosure requests by jurisdiction and request category where a requestor has indicated the data will be processed for nonpublic gTLD registration data received in response to an approved RDRS request. The requestor selects the jurisdiction(s) where the data they are requesting will be processed and may select multiple jurisdictions for each request. Requestors may choose from 250 jurisdictions when submitting a request. See the RDRS Usage Metrics Reports section for the downloadable CSV format.

The data shown for this metric is cumulative and tracking began in October 2024.

Note: Each request category is selected at the requestor's discretion. RDRS does not include an authentication mechanism to verify whether requests come from law enforcement authorities or any other category available for selection. Furthermore, ICANN is not the final recipient of these disclosure requests and does not evaluate or make determinations regarding the assertions made in individual requests. All requests are forwarded to the appropriate registrar for evaluation.

Processing Jurisdiction	Computer Security Incident Response Team CSIRT	Consumer Protection	Cybersecurity Incident Response Team Non-CSIRT	Dispute Resolution Service Provider	Domain Investor	IP Holder	Law Enforcement	Litigation Dispute Resolution Non-IP	Other	Research Non-Security	Security Researcher	Total
Argentina	1	2	2									5
Australia	2		2	1	3							8
Austria			1		3							4
Bangladesh	1	2				1						4
Belgium	1	1	2		2							6
Bosnia and Herzegovina		1										1
Brazil		5	4		3		1					13
Bulgaria			1			1						2
Canada	1	5	2		6	1		1				16
Cayman Islands					1							1
Chile					1							1
China	1	1	7		1		3		1	2	1	17
Colombia	1	2			1			1				5
Croatia			1									1
Cyprus		4	1							2		7

Czech Republic			1									1
Denmark		1	2		2				6			11
Ecuador								1			1	2
Egypt	1											1
Estonia			1									1
Ethiopia	1											1
Finland			1									1
France		4	8		46					2	1	61
Germany	1	5	6	3	22	4		5		2		48
Greece		3	2									5
Greenland		1										1
Hong Kong, China			1		2					1		4
Hungary			1					1				2
India		1	4		4	2	1	2		3	1	18
Indonesia	1		1	1	1							4
Ireland			1		1							2
Islamic Republic of Iran								1				1
Israel					1				1		1	3
Italy	1	3	4		5							13
Jamaica					1							1
Japan					1	19						20
Kazakhstan		1										1
Kenya								1				1
Latvia			1		1					3		5
Lithuania			2									2
Luxembourg			1		1					2		4
Malaysia	1		1									2
Maldives									1			1
Malta		9	1		1							11
Mexico	1		2					1				4
Morocco										1		1
Nepal			1									1
Netherlands	1		6		2		1	1		1	2	14
New Zealand			1		1							2
Nigeria					2							2
Norway										1		1

Papua New Guinea								2				2
Philippines							1					1
Poland		1	1		5							7
Portugal		19	1		1							21
Qatar			3									3
Republic of Korea		1						2				3
Republic of Türkiye			6		1			1			2	10
Romania			1									1
Russian Federation		1										1
Saint Kitts and Nevis						1						1
Saudi Arabia				1				2				3
Serbia					3	1						4
Singapore	1		2				1					4
Slovakia			1		1	1						3
Slovenia			1									1
South Africa					1							1
Spain			5		3						1	9
Sweden		3	2		3							8
Switzerland		2			2	1	1	1		4	1	12
Thailand		1	1									2
Uganda							1					1
Ukraine		1	1		1						1	4
United Arab Emirates		1				1		1			1	4
United Kingdom of Great Britain and Northern Ireland		37	7		15	2	1	1		10		73
United States of America	66	76	207	2	311	41	3	13	4	21	10	754
Viet Nam		3				1						4
Virgin Islands, British					1							1
Yemen										1		1

Total	**83**	**197**	**311**	**8**	**463**	**77**	**14**	**38**	**13**	**56**	**23**	**1283**

List of Participating Registrars

The registrars currently participating in the RDRS two-year pilot are listed below. Collectively these registrars manage approximately 47% of the total number of Domains Under Management (DUM) in the generic top-level domain space.

#	IANA ID	Registrar Name
1	1515	123-Reg Limited
2	73	Abion AB
3	3785	AC Webconnecting N.V. DBA domain.cam
4	3854	Access Japan Co, Ltd. dba REGne (www.regne.net)
5	420	Alibaba Cloud Computing (Beijing) Co., Ltd.
6	1599	Alibaba Cloud Computing Ltd. d/b/a HiChina (www.net.cn)
7	468	Amazon Registrar, Inc.
8	3245	Arcanes Technologies
9	1448	Blacknight Internet Solutions Ltd.
10	612	Blue Razor Domains, LLC
11	353	Bombora Technologies Pty Ltd
12	4144	C-Soft Oy dba NordName
13	4336	Cloud DNS Ltd
14	15	COREhub, S.R.L.
15	1298	Corporation Service Company (DBS), Inc.
16	3880	Cross Marketing Technology Ltd.
17	299	CSC Corporate Domains, Inc.
18	430	CSC Digital Brand Services (UK) Limited
19	671	CSC Management Consulting (Shanghai) Co., Ltd.
20	226	Deutsche Telekom AG
21	1645	Diamatrix C.C.
22	466	DomainSite, Inc.
23	1501	DotRoll Kft.
24	1639	EBRAND Holdings S.A.
25	696	Entorno Digital, S.A.
26	1052	EuroDNS S.A.
27	965	Fluccs - The Australian Cloud Pty Ltd
28	3235	Focus IP, Inc. dba Tracer
29	81	Gandi SAS
30	1151	Go Australia Domains, LLC
31	1150	Go Canada Domains, LLC
32	1149	Go China Domains, LLC
33	1153	Go France Domains, LLC

34	1152	Go Montenegro Domains, LLC
35	3786	GoDaddy Corporate Domains, LLC
36	1659	GoDaddy Online Services Cayman Islands Ltd.
37	146	GoDaddy.com, LLC
38	444	Inames Co., Ltd.
39	603	Inic GmbH
40	1376	Instra Corporation Pty Ltd.
41	1728	IP Twins SAS
42	1656	Kagoya Japan Inc.
43	809	Ledl.net GmbH
44	1625	LEMARIT GmbH
45	1466	Lexsynergy Limited
46	292	MarkMonitor Inc.
47	1390	Mesh Digital Limited
48	2288	Metaregistrar BV
49	638	Name SRS AB
50	625	Name.com, Inc.
51	826	Name.net, Inc.
52	452	Name105, Inc.
53	1040	Name106, Inc.
54	1547	Name117, Inc.
55	1068	NameCheap, Inc.
56	1464	NameWeb BVBA
57	1336	Net-Chinese Co., Ltd.
58	470	Nom-iq Ltd. dba COM LAUDE
59	76	Nominalia Internet SL
60	3871	ODTÜ Geliştirme Vakfi Bilgi Teknolojileri Sanayi Ve Ticaret Anonim Şirketi
61	1649	P.A. Viet Nam Company Limited
62	839	Realtime Register B.V.
63	168	Register SpA
64	1290	SafeBrands SAS
65	1741	Shinjiru Technology Sdn Bhd
66	3791	SINO PROFIT (HONG KONG) LIMITED
67	3862	Spaceship, Inc.
68	2482	Stichting Registrar of Last Resort Foundation
69	836	The Namespace Group Pty Ltd
70	819	Turkticaret.net Yazılım Hizmetleri Sanayi ve Ticaret A.Ş.
71	3802	Ubilibet S.L.
72	460	Web Commerce Communications Limited dba WebNic.cc
73	456	Webnames.ca Inc.

74	938	WHC Online Solutions Inc.
75	440	Wild West Domains, LLC
76	120	Xin Net Technology Corporation
77	4157	Yunnan Landui Cloud Computing Co., Ltd.
78	4143	Zuffix, Inc.

Annex E– RDRS SC Membership and Attendance

Roster & Attendance - All Events

Row Labels	Invited	Attended	Percent	Role	SOI	Start Date	Depart Date
Member	**627**	**420**	**67,0%**				
At-Large Advisory Committee (ALAC)	**39**	**31**	79,5%				
Alan Greenberg	39	31	79,5%		https://icann-community.atlassian.net/wiki/x/AYJdBg	01.01.2024	
Commercial Business Users Constituency (BC)	**39**	**29**	74,4%				
Steve DelBianco	39	29	74,4%		https://icann-community.atlassian.net/wiki/x/V6RdBg	08.12.2023	
GNSO Council	**73**	**68**	93,2%				
Sebastien Ducos	73	68	93,2%	Chair	https://icann-community.atlassian.net/wiki/x/q71dBg	04.12.2023	
Independent	**39**	**29**	74,4%				
Paul McGrady	39	29	74,4%		https://icann-community.atlassian.net/wiki/x/84JdBg	04.12.2023	
Intellectual Property Constituency (IPC)	**63**	**50**	79,4%				
John McElwaine	63	50	79,4%	Vice-Chair	https://icann-community.atlassian.net/wiki/x/n4JdBg	07.12.2023	

Internet Corporation for Assigned Names & Numbers (ICANN)	**29**	**19**	65,5%				
Eleeza Agopian	29	19	65,5%	Liaison		17.01.2024	
Internet Service Providers and Connectivity Providers Constituency (ISPCP)	**39**	**23**	59,0%				
Thomas Rickert	39	23	59,0%		https://icann-community.atlassian.net/wiki/x/wYBdBg	08.01.2024	
Non-Commercial Stakeholder Group (NCSG)	**72**	**31**	43,1%				
Farzaneh Badii	33	24	72,7%		https://icann-community.atlassian.net/wiki/x/7ZBdBg	24.04.2024	
Stephanie Perrin	39	7	17,9%		https://icann-community.atlassian.net/wiki/x/-YJdBg	11.12.2023	
Registrar Stakeholder Group (RrSG)	**39**	**32**	82,1%				
Sarah Wyld	39	32	82,1%		https://icann-community.atlassian.net/wiki/x/IYNdBg	04.12.2023	
Registry Stakeholder Group (RySG)	**39**	**36**	92,3%				
Marc Anderson	39	36	92,3%		https://icann-community.atlassian.net/wiki/x/0YFdBg	05.12.2023	
Security and Stability Advisory Committee (SSAC)	**39**	**34**	87,2%				
Stephen Crocker	39	34	87,2%		https://icann-community.atlassian.net/wiki/x/ubtdBg	05.12.2023	

ICANN Board	**39**	**6**	15,4%				
Becky Burr	39	6	15,4%	Liaison	https://icann-community.atlassian.net/wiki/x/r4JdBg	07.12.2023	
Governmental Advisory Committee (GAC)	**78**	**32**	41,0%				
Danny Kelly	39	0	0,0%		https://icann-community.atlassian.net/wiki/x/ndNdBg	03.01.2024	
Gabriel Andrews	39	32	82,1%		https://icann-community.atlassian.net/wiki/x/B9RdBg	04.01.2024	
Alternate	**60**	**59**	**98,3%**				
Non-Commercial Stakeholder Group (NCSG)	**0**	**0**	0%				
Reema Moussa	0	0	0%		https://icann-community.atlassian.net/wiki/x/EdRdBg	07.12.2023	
Registrar Stakeholder Group (RrSG)	**30**	**30**	100,0%				
Roger Carney	30	30	100,0%		https://icann-community.atlassian.net/wiki/x/M5BdBg	04.12.2023	
Governmental Advisory Committee (GAC)	**30**	**29**	96,7%				
Kenneth Merrill	7	7	100,0%		https://icann-community.atlassian.net/wiki/x/I9BdBg	04.12.2023	09.08.2024
Owen Fletcher	23	22	95,7%		https://icann-community.atlassian.net/wiki/x/9dZdBg	08.08.2024	
Grand Total	**687**	**479**	**96,7%**				

Staff Support Roster

Row Labels						Start Date	Depart Date
Staff - Assigned							
Internet Corporation for Assigned Names & Numbers (ICANN)							
Caitlin Tubergen						01.12.2023	
Devan Reed						01.12.2023	
Feodora Hamza						15.02.2024	
Julia Bisland						01.12.2023	
Lisa Carter						15.02.2024	
Terri Agnew						01.12.2023	
Dana Kuebler						25.03.2024	30.06.2025
Delina Watson						27.06.2025	
Diana Middleton						07.12.2023	21.02.2024
Odeline MacDonald						16.01.2024	
Simon Raveh						07.03.2024	