

GNSO COUNCIL SSAD SUPPLEMENTAL RECOMMENDATIONS TEAM

Subject	Non-Adopted SSAD Recommendations
Background	<p>On 29 October 2020 the GNSO Council submitted to the ICANN Board its Recommendations Report on the Expedited Policy Development Process (EPDP) Temporary Specification for gTLD Registration Data Phase 2. On 25 March 2021, the ICANN Board directed ICANN org to perform an Operational Design Phase (ODP) on the EPDP Temporary Specification for gTLD Registration Data Phase 2 and the System for Standardized Access/ Disclosure (SSAD) to Nonpublic generic Top-Level Domain Registration Data (SSAD Recommendation 1-18). On 25 January 2022, ICANN org delivered the Operational Design Assessment (ODA), the main output of the ODP. The GNSO Council subsequently tasked the EPDP Phase 2 Small Team (Small Team) with assessing the ODA.</p> <p>At the GNSO Council’s request, the Board paused its consideration of the SSAD recommendations while work on a "proof of concept" was being conducted. This “proof of concept” eventually became the Registration Data Request Service (RDRS). The RDRS was used to collect data about system usage, which was to be used to help inform future discussions between the GNSO Council and the ICANN Board on the pending SSAD Recommendations 1–18.</p> <p>Data collected from the RDRS was assessed by the RDRS Standing Committee. The Standing Committee’s report provided 6 recommendations, including a recommendation for the Board to “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.” The Standing Committee recommended non-adopting all 18 SSAD recommendations as they were developed and adopted by the GNSO Council as a comprehensive and interdependent package. Furthermore, the Standing Committee provided detailed suggestions on how to keep or modify each of the 18 SSAD recommendations.</p> <p>On 12 March 2026, the Board passed a resolution, not adopting the pending SSAD recommendations. In its resolution, the Board noted after reviewing input from the community, engaging with the Standing Committee, and consulting the GNSO Council on the SSAD policy recommendations, that the SSAD Recommendations in the EPDP Phase 2 Final Report were not in the best interests of the ICANN community or ICANN. The Board’s non-adoption of the pending SSAD recommendations in order to trigger the Supplemental Recommendation process is outlined in Annex A, Section 9 of the ICANN Bylaws.</p>

	<p>As noted in the discussion on 12 February 2026 between the Board and GNSO Council, non-adoption was recommended by the Standing Committee, and is an opportunity for the GNSO Council to issue Supplemental Recommendations. For the avoidance of doubt, non-adoption should not be interpreted as an opportunity to relitigate carefully drafted compromises, viewed as the SSAD recommendations being discarded, or a signal that the Board will not adopt Supplemental SSAD Recommendations.</p> <p>The GNSO Council has determined that an SSAD Supplemental Recommendations Team consisting of Councilors in combination with additional ICANN Community members is the appropriate mechanism to carefully analyze Supplemental Recommendations, consider Board concerns and Standing Committee recommendations, and, where deemed appropriate, recommend proposed modifications to the non-adopted recommendations for the GNSO Council’s consideration.</p>
<p>Assignment</p>	<p>Task: The SSAD Supplemental Recommendations Team is expected to address the following assignment:</p> <ol style="list-style-type: none"> 1) Provide Supplemental Recommendations* on all SSAD recommendations 2) Advise the GNSO Council on any specific questions or issues to raise during meetings with the ICANN Board concerning SSAD; 3) Propose modifications to SSAD recommendations based on the recommendation rationale provided in the Standing Committee’s Final Findings Report. <p>*In drafting proposed Supplemental Recommendations, the SSAD Supplemental Recommendations team is expected to consider:</p> <ul style="list-style-type: none"> - the potential impact of any recommendations on the Global Public Interest (see example checklist); - the potential impact of any recommendations on human rights; - the potential impact on existing Consensus Policies. <p>The SSAD Supplemental Recommendations Team is expected to refer back to the GNSO Council if it is the consensus of the group that a particular proposed outcome may be out of scope of the Assignment, (e.g., developing new policy versus modifications rooted in foundational documents).</p> <p>As outlined in its 18 March 2026 correspondence to the GNSO Council, the Board expects the SSAD Supplemental Recommendations Team to incorporate the following four elements in the Supplemental Recommendations:</p> <ol style="list-style-type: none"> 1. Mandatory registrar participation in mechanisms for requesting gTLD nonpublic registration data, which align with the presumption that consensus policies are binding on all contracted

	<p>parties.</p> <ol style="list-style-type: none"> 2. Confirmation of how the mechanism can be used to make and respond to requests for gTLD nonpublic registration data for underlying affiliated privacy/proxy domains. 3. Inclusion of service level agreements that require registrars to provide substantive responses to disclosure requests on an agreed timeline for urgent requests that are authenticated, as originally envisioned in the SSAD recommendations. 4. An authentication mechanism for law enforcement authorities and a phased approach for federated authentication for other user groups to facilitate urgent request responses, as originally envisioned in the SSAD recommendation. <p>The Board noted that these four elements will help produce a long-term solution for requesting access to gTLD nonpublic registration data.</p> <p>The SSAD Supplemental Recommendations Team is advised to take into account the:</p> <ul style="list-style-type: none"> • EPDP on the Temporary Specification for gTLD Registration Data Phase 2 Final Report • RDRS Standing Committee Final Findings Report and the recommendations therein; • GAC Advice from ICANN64, ICANN70, and ICANN79; • SAC 118: SSAC Comments on Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team – PHASE 2A; • SSAD Operational Design Assessment • RDRS Policy Alignment Analysis and Public Comment Summary; <p>and</p> <ul style="list-style-type: none"> • Timeline for Urgent Requests and Public Comment Summary <p>Please see the “Documents” section below for additional supporting information.</p> <p>The SSAD Supplemental Recommendations Team will be asked to deliver a report to the GNSO Council containing Supplemental Recommendations, the rationale for the Supplemental Recommendations, and any additional information deemed necessary for GNSO Council consideration. The final decision on the Supplemental Recommendations rests with the GNSO Council.</p>
Timing	<p>The SSAD Supplemental Recommendations Team shall commence its work after the Board’s non-adoption. The Board non-adopted the recommendations at its meeting on 12 March 2026.</p> <p>The SSAD Supplemental Recommendations Team is expected to deliver proposed Supplemental Recommendations, the rationale for the Supplemental Recommendations, and any additional information deemed necessary for GNSO Council consideration by January 2027.</p>
Members	Membership: The SSAD Supplemental Recommendations Team shall

be open to any interested and committed GNSO Councilor.

Additionally, the SSAD Supplemental Recommendations Team can invite up to:

- Two (2) members of the Registries Stakeholder Group (RySG);
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- One (1) member of the Business Constituency;
- One (1) member of the Intellectual Property Constituency;
- One (1) member of the Internet Service Providers and Connectivity Providers Constituency;
- Three (3) members of the Non-commercial Stakeholder Group;
- One (1) member and one (1) alternate from the At-Large Advisory Committee
- One (1) member and one (1) alternate from the Governmental Advisory Committee; and
- One (1) member and one (1) alternate from the Security and Stability Advisory Committee

The SSAD Supplemental Recommendations Team may be assigned the following liaisons:

- At least one (1) member of the ICANN Board
- At least one (1) member of ICANN org staff (focusing on implementation)

The SSAD Supplemental Recommendations Team is expected to be familiar, or familiarize themselves, with the SSAD recommendations (Recs. 1-18) in the EPDP (RegData) Phase 2 Final Report and the RDRS Standing Committee Final Findings Report.

Leadership: A lead for the SSAD Supplemental Recommendations Team will be determined once the SSAD Supplemental Recommendations Team has been established. The role of the Lead of the SSAD Supplemental Recommendations Team is to lead meetings and provide updates to the full GNSO Council. If and when the Lead is to discuss the topic outside of the Council context, the GNSO Council shall agree on talking points.

ICANN org liaison(s): ICANN org's GDS function is invited and encouraged to assign at least one liaison to support the SSAD Supplemental Recommendations Team.

ICANN Board liaison(s): The ICANN Board is invited and encouraged to assign at least one liaison to support the SSAD Supplemental Recommendations Team.

The SSAD Supplemental Recommendations Team's objective is to present the GNSO Council with recommendations that enjoy the full consensus of the SSAD Supplemental Recommendations Team. Should this not be possible, the Lead is expected to assess the level of consensus achieved (as per the GNSO Working Group Guidelines) and

	<p>communicate this to the GNSO Council together with the different views expressed.</p>
<p>Documents</p>	<ul style="list-style-type: none"> ● EPDP on the Temporary Specification for gTLD Registration Data Phase 2 Final Report: https://gnso.icann.org/sites/default/files/file/field-file-attach/epdp-phase-2-temp-spec-gtld-registration-data-2-31jul20-en.pdf. ● Registration Data Request Service Standing Committee Council Report: https://gnso.icann.org/sites/default/files/policy/2025/draft/rdrs-sc-findings-report-10nov25-en.pdf. ● RDRS Policy Alignment Analysis: https://itp.cdn.icann.org/en/files/registration-data-request-service-rdrs/registration-data-request-policy-alignment-analysis-30-10-2025-en.pdf. ● RDRS Policy Alignment Analysis Public Comment Summary Report: https://itp.cdn.icann.org/en/files/registration-data-request-service-rdrs/summary-report-rdrs-policy-alignment-analysis-20-01-2026-en.pdf. ● Timeline for Urgent Requests and Public Comment Summary: https://itp.cdn.icann.org/en/files/new-generic-top-level-domain-gtld-program/summary-report-timeline-ur-lawful-disclosure-nonpublic-registration-data-14-01-2026-en.pdf. ● 02 March 2026 Correspondence - GNSO Council Dialogue with ICANN Board re: SSAD Recommendations: https://itp.cdn.icann.org/en/files/correspondence/payne-to-sinha-02-03-2026-en.pdf. ● 18 March 2026 Correspondence - GNSO Expedited Policy Development Process (EPDP) Phase 2 Final Report and the System for Standardized Access/Disclosure (SSAD) Policy Recommendations: https://itp.cdn.icann.org/en/files/correspondence/sinha-to-payne-18-03-2026-en.pdf. ● 12 March 2026 ICANN Board Resolution: https://www.icann.org/en/board-activities-and-meetings/materials/approved-resolutions-regular-meeting-of-the-icann-board-12-03-2026-en#section2.a. ● ICANN64 GAC Advice: https://gac.icann.org/contentMigrated/icann64-kobe-communicue. ● ICANN70 GAC Advice:

	<p>https://gac.icann.org/contentMigrated/icann70-gac-communicue?language_id=1.</p> <ul style="list-style-type: none"> ● ICANN79 GAC Advice: https://gac.icann.org/contentMigrated/icann79-san-juan-communicue?language_id=1. ● SAC 118: SSAC Comments on Initial Report of the Expedited Policy Development Process (EPDP) on the Temporary Specification for gTLD Registration Data Team – PHASE 2A: https://itp.cdn.icann.org/en/files/security-and-stability-advisory-committee-ssac-reports/sac-118-en.pdf. ● SSAD Operational Design Assessment: https://www.icann.org/en/system/files/files/ssad-oda-25jan22-en.pdf.
Documentation of the Work	<ul style="list-style-type: none"> ● A wiki page will be created to capture at a minimum, membership, background document and new documents generated by the SSAD Supplemental Recommendations Team, and meeting recordings. ● Unless a specific meeting might benefit from an unrecorded dialogue, all meetings will be recorded. In this instance, transparency will be accounted for in some other fashion (e.g., notes, readout, report, etc.). ● A mailing list will be created for this SSAD Supplemental Recommendations Team and will be publicly archived on the Wiki. Observers may request to be added to the mailing list on a read-only basis. ● Observers may attend meetings live; however, observers will have no speaking or chat privileges.
Next Steps	<ol style="list-style-type: none"> 1. Following GNSO Council approval / non-objection, SSAD Supplemental Recommendations Team to commence work on providing Supplemental Recommendations to the SSAD recommendations 2. SSAD Supplemental Recommendations Team to reach out to GNSO SG/Cs and interested ACs to request identification of SMEs to assist the SSAD Supplemental Recommendations Team. 3. SSAD Supplemental Recommendations Team to develop a high-level timeline for next steps to allow for advance scheduling and check-ins with GNSO Council.