

9 February 2026

Rafik Dammak
Chair | Noncommercial Stakeholder Group (NCSG)

Re: The October 2025 Resolution Concerning Law-Enforcement Authentication and Registrant Rights

Dear Rafik,

Thank you for your [letter](#), dated 1 December 2025. The Board appreciates the concerns the Noncommercial Stakeholder Group (NCSG) regularly raises as it relates to domain name registrants and end users. We understand from your letter that the NCSG would like to see the Board revise its rationale for its [30 October 2025 Approved Resolution](#) asking ICANN org to continue operating the Registration Data Request Service (RDRS) while the community continues ongoing policy work related to the proposed System for Standardized Access/Disclosure (SSAD) recommendations.

The Board's 30 October resolution directs the org to continue exploring mechanisms for law enforcement authentication, but it does not direct the implementation of such mechanism. The [RDRS Policy Alignment Analysis](#) was published concurrently with the Board's resolution on the RDRS. In this analysis, the Board also notes the importance of an authentication mechanism in supporting an enforceable timeline for urgent requests for nonpublic generic top-level domain registration data. In addition, the paper notes that its request for continued work on an authentication mechanism is aligned with the [GNSO Standing Committee's own recommendation](#). That recommendation received full consensus from all GNSO Standing Committee members, including the NCSG.

The Board does not plan to modify the text of its resolution but wants to make clear its position regarding the issues raised by the NCSG. As with all resolutions, any action the Board takes must align with [ICANN's Mission and Core Values](#), which includes accounting for the global public interest and respecting internationally recognized human rights. The Board also acknowledges the NCSG's points regarding safeguards, transparency, and accountability, and notes that it shares the NCSG's expectations for a mechanism that meets ICANN's standards for transparency and accountability. In addition, it is important to note that section 10 of the [Registration Data Policy](#) requires registrars to publish a clear process for how to submit requests for disclosure of non-public registration data and to review properly-formed requests on their merits, considering the specific rationale and basis for each request. Should the registrar deny a request, it is also required to include a rationale for why the request was denied and "an analysis and explanation of how the fundamental rights and freedoms of the data subject were weighed against the legitimate interest of the requestor (if applicable)."

The Board is aware that the NCSG and other community groups are involved in conversations with the Governmental Advisory Committee's Public Safety Working Group and ICANN org representatives to explore how an authentication mechanism could work in practice. The Board

encourages the NCSG to continue to contribute and share input about how such a mechanism may best operate to ensure transparency and accountability.

Thank you,



Tripti Sinha,
Chair, ICANN Board of Directors