03 June 2024

Ram Mohan
Chair, Security and Stability Advisory Committee (SSAC)

RE: SAC122: SSAC Report on Urgent Requests in the gTLD Registration Data Policy

Dear Ram,

I am writing to thank you and the SSAC for the 12 December 2023 advice issued in the report titled [SAC122: SSAC Report on Urgent Requests in the gTLD Registration Data Policy](). The Board appreciates the SSAC's dedication and insightful advice on urgent requests for data disclosure. The Board acknowledges the SSAC's recommendations that policies pertaining to urgent requests should:

- Provide additional structure so that Urgent Requests will be handled in an appropriately expedited fashion;
- Ensure that response times for handling Urgent Requests be fit for purpose; and
- Allow for ICANN org to acquire and document data regarding Urgent Requests and make high-level information available to the community for future consideration.

As mentioned in letters shared with the [Government Advisory Committee (GAC)]() and [Registrar Stakeholder Group]() on 11 February 2024, the Registration Data Policy is the implementation of the Phase 1 recommendations of the [Expedited Policy Development Process (EPDP)]() on the Temporary Specification for gTLD Registration Data. At the Board's direction, ICANN org has worked with a multistakeholder Implementation Review Team (IRT) since 2019 to draft requirements based on these recommendations. As the EPDP Phase 1 policy recommendations explicitly left the timeline for urgent requests for disclosure of data to be worked out in implementation, ICANN org facilitated the development of the relevant requirements with the assistance of the IRT.

As stated in the communications noted above, the Board's consultations indicated broad agreement in the community to publish the Registration Data Policy without the provision on urgent requests for disclosure. ICANN [published]() the Registration Data Policy accordingly on 21 February 2024.

Furthermore, the Board believes that it is necessary to revisit EPDP Phase 1 Recommendation 18 concerning urgent requests in the context of situations that pose an imminent threat to life, serious bodily harm, infrastructure, or child exploitation, and the manner in which such emergencies are currently handled. The Board plans to initiate a consultation with the GNSO Council in the near future to establish a way forward on this issue. The Board concludes that further work on policies and procedure around Urgent Requests needs to occur in the consensus driven multistakeholder model and looks forward to the SSAC's participation in these discussions, if and when a plan is agreed upon with the GNSO Council.

The Board appreciates the SSAC's advice regarding policies regarding urgent requests and will duly take these recommendations into account in its consultation with the GNSO Council. As the SSAC notes in SAC122, this advice is to be considered by all groups working on policies related to Urgent Requests. The Board will refer to these recommendations as appropriate in its discussions moving forward and will be closing out SAC122 advice in the Action Request Register (ARR).

Sincerely,

Tripti Sinha
Chair, ICANN Board of Directors