

PPSAI Policy Implementation (Privacy Proxy Service Accreditation Issues)

Implementation Review Team (IRT) Meeting



ICANN83 Prague
Wednesday, 11 June 2025

Agenda

- Welcome & Introductions
- Background
- Threshold Questions and Accreditation Model Discussion
- Next Steps
- Questions and AOB

Introduction: IRT and IPT

- 56 IRT Members as of 4 March 2025
 - 1 GNSO Liaison
 - 3 Stakeholder Group representatives and 3 alternates appointed
- ICANN org Implementation Project Team
 - Project Core Team
 - Extended SME Team

The Community Wiki can be accessed [here](#).

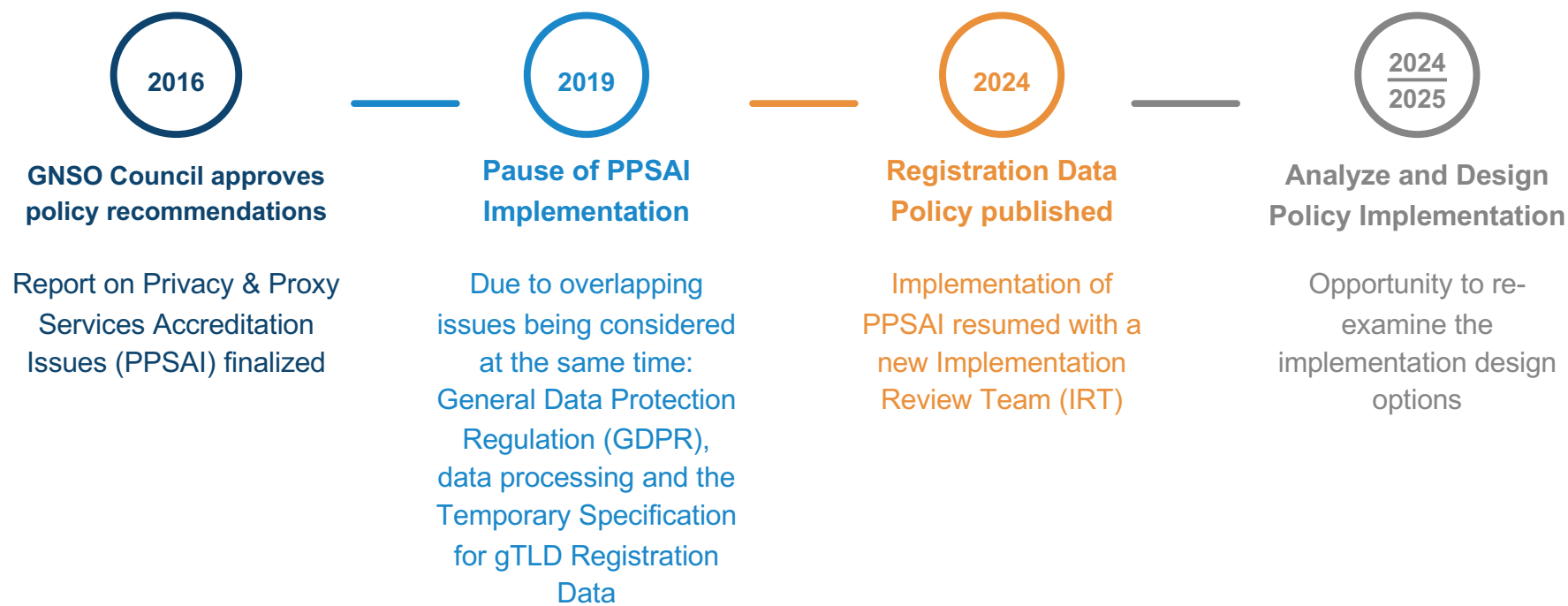
Background

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- The GNSO approved policy recommendations on Privacy & Proxy Services Accreditation Issues (PPSAI) in 2016.
 - According to the [Final Report](#), some goals of the recommendations included clarity, transparency, and consistency in the operation of services.
- The Board adopted the recommendations in 2016.
- ICANN org worked on the implementation with an IRT until 2019, then [paused the work](#) due to overlapping issues being considered in the community around GDPR, data processing, and the Temporary Specification.
- Although gTLD registration data is no longer public by default, proxy and privacy services still exist within the ecosystem.
- The PPSAI IRT reconvened in July 2024 after issues around GDPR, data processing, and the Temporary Specification progressed.

Timeline

- [2013 P/P Specification to RAA](#) (stopgap measure)



Purpose of IRT Work

1

The PPSAI IRT is tasked with assisting staff in developing the implementation details for the Privacy and Proxy Services Accreditation Program, to ensure the implementation conforms to the intent of the Final Recommendations.

2

As a first step, the IRT is informing the development of a set of threshold questions for the GNSO Council to define the major decisions needed to move forward on implementation.

3

The IRT is not a policymaking body. If any policy issues arise during the implementation they must be referred to the GNSO for resolution and/or input.

Threshold Questions and Accreditation Model Discussion

Threshold Questions

Category 1

Are there any policy questions or items the IRT already wants to bring to the GNSO Council for guidance? **TQ.A**

Category 2

Implementation Model: Accreditation Program or Alternative Implementation

- a. **Can an implementation model without a new standalone accreditation program remain consistent with the policy recommendations?** **TQ.B**

Category 3

Disclosure Frameworks (Intellectual Property and Law Enforcement)

- a. Are there specific areas to revisit under new law/policy?
- b. Can these frameworks be aligned with existing work on the Registration Data Request Service (RDRS), Registration Data Policy, and other existing procedures and remain consistent with the policy recommendations? **TQ.C, TQ.K**

Introduction: IPT.PPSAI Accreditation Models

Previous community considerations regarding accreditation models, from the PPSAI PDP WG:

“Finally, the WG [Working Group] has concluded the registrar accreditation model with its multiple steps, governed by the RAA, may not be entirely appropriate for P/P services; however, it is a useful starting point from which relevant portions may be adapted to apply to P/P service providers. The implications of adopting a particular accreditation model will need to be worked out as part of the implementation of its policy recommendations, if adopted.”

Page 19 of the [Final Report on the Privacy & Proxy Services Accreditation Issues, 07 December 2015](#)

(Section 1.3.2 Additional General Recommendations)

Introduction: IPT.PPSAI Accreditation Models

- Initially, “full” accreditation model (new accreditation agreement & program for all providers) was designed to implement recommendations, and reflect prior IRT input
- Model benefits:
 - Clear path to accreditation and enforcement of agreement requirements for contracted providers irrespective of provider’s relationship with registrar
- Model challenges:
 - Significant operational burden to implement
 - Proposed fees challenged by some IRT members as unduly burdensome
 - May need or benefit from adjustments in light of subsequent developments (EPDP, new regulations, etc)
 - Does not solve the “how to identify providers unknown to registrar” issue

Introduction: IPT.PPSAI Accreditation Models

Taking a step back from all the documentation created to date: What does community recommend and intend privacy/proxy service “accreditation” to look like today?

- Is an “accreditation agreement” model the best approach?
- Did the community recommend, and does the community recommend today, as a matter of consensus policy, that ICANN must implement a new, P/P-specific accreditation program?
- Could a different model meet the policy objectives?

These factors inform **Threshold Question B**: Can an implementation model without a new standalone accreditation program remain consistent with the policy recommendations?

Introduction: IPT.PPSAI Accreditation Models

To help inform the community's consideration of this issue, IPT has identified 3 potential models for implementation (the originally considered model, and 2 alternative models).

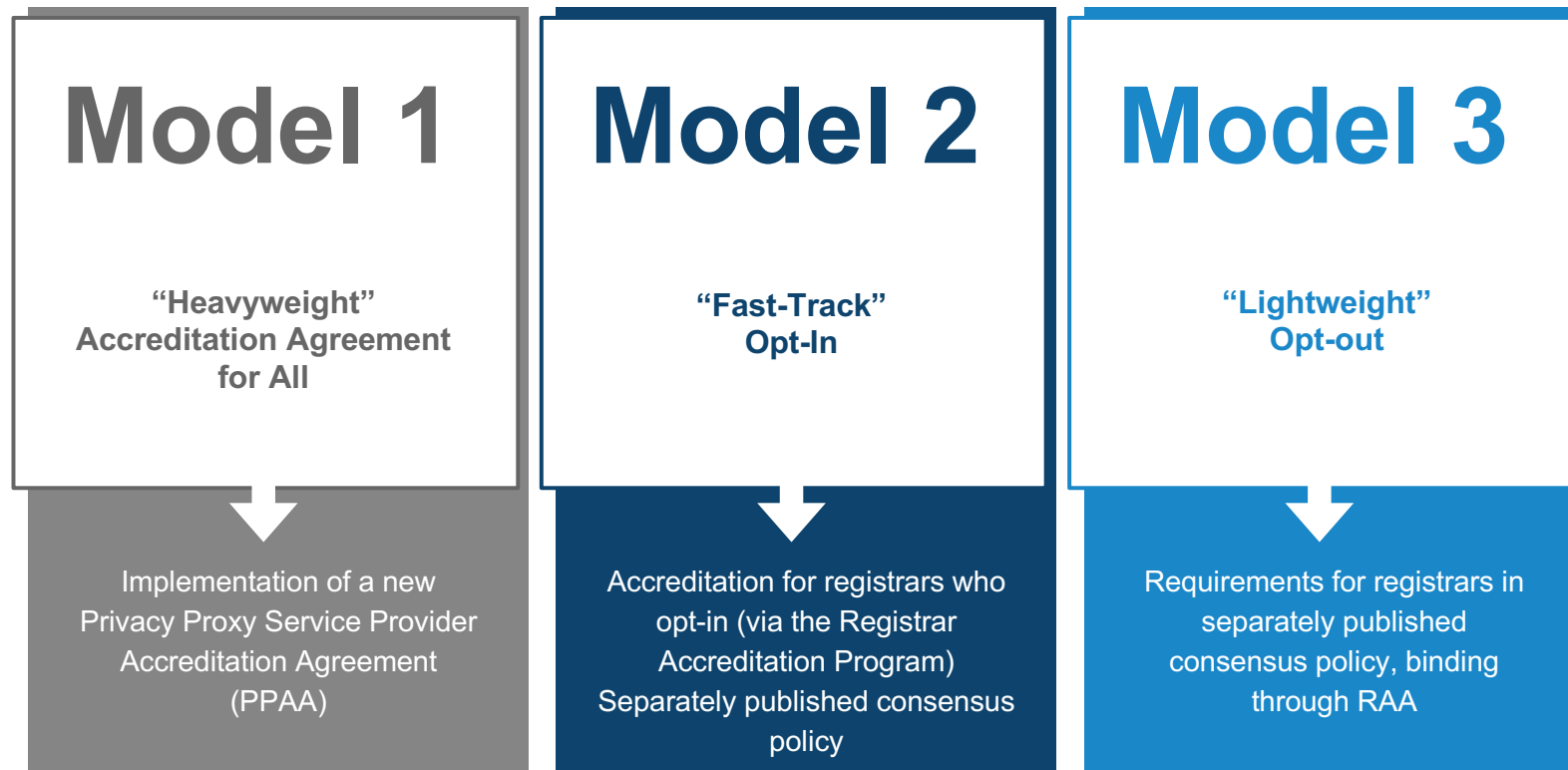
These models:

- Represent conceptual approaches to implement **original recommendations**
- Are preliminary, high-level, and may need refinement
- Are shaped by the text of the policy recommendations, which envision an “accreditation process” and require:
 - a list of accredited providers
 - a mechanism for ICANN to enforce the requirements on parties that may (or may not) be related to (or even identifiable by) an existing contracted party

Key Questions:

- Could ICANN implement models 2 or 3 consistently with current policy recommendations?
- How does each model align with community expectations?
- Does IRT believe further policy development or guidance is necessary or desirable?

3 Implementation Models



Next Steps

Current Work Plan



June 26: IRT Meeting

Discuss draft verbiage of Threshold Question B.



July 18: Finalize Threshold Questions and supporting materials

Finalize draft verbiage of Threshold Questions A, B, C & K.



Pause IRT Sessions

Pause from bi-weekly sessions until GNSO Council determines path forward for implementation or the GNSO submits questions back to the IRT.

Current Work Plan

	Topic(s) of Discussion	Session #	Date	Notes
Threshold Questions	Threshold Question 3: Disclosure Framework Threshold Category 3, Part B, Discuss Comments on Alignment Document.	18	10-Apr-2025	
	Threshold Question 2: Implementation Model: Accreditation Models & Discuss IRT comments	20	15-May-2025	ICANN83 PrepWeek: Policy and Advice Update Webinar , Tuesday, 27 May, 17:00 CEST / 15:00 UTC
	Threshold Question 2: Accreditation Models: Discuss IRT comments. a) Can an implementation model without a new standalone accreditation program remain consistent with the policy recommendations?	22	11-Jun-2025	ICANN83 (9-12 June 2025) tentatively scheduled for 9-10:15 local time on Wednesday, 11 June 2025
	Threshold Question B: Review and discuss draft language	24	26-Jun-2025	
	Finalize Threshold Questions: Revised Language.	24	10-Jul-2025	IRT Milestone
GNSO Council Guidance	Pause IRT Sessions		Jul 2025	
	Present Questions GNSO Council		Aug 2025	
Implementation Planning	Review GNSO Council responses to Threshold Questions		Oct 2025	Pending GNSO Response

Engage with ICANN



Thank You and Questions

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Appendix:

- IRT Membership
 - to join, please email: irt-rsvp@icann.org
 - a Statement of Interest (SOI) is required to complete your membership
- IRT Workspace
 - [Privacy and Proxy Services Accreditation Implementation Review Team](#)