

## **Proposed path forward on EPDP Phase 1 Recommendation 18 on Urgent Requests:**

**Step 1:** The GNSO Council will confirm that implementing the Urgent Request response timeline language incorporating the authentication mechanism, as detailed in the [“Proposed Timeline for Urgent Requests”](#) published for public comment in October 2025, is consistent with Recommendation 18.

**Step 2:** The Council and a community group\* will discuss integrating an authentication mechanism for Law Enforcement Agents (LEA) submitting Urgent Requests as part of the process to develop Supplemental Recommendations for the SSAD (EPDP Phase 2) recommendations, specifically Recommendations 1 (“Accreditation”) and 2 (“Accreditation of Governmental Entities”).

*\*Note that the composition of this group has yet to be determined by Council*

### **Rationale:**

- Multiple stakeholders have asserted that the ability to authenticate LEA requestors is an important factor in enabling responses to Urgent Requests within an appropriate timeframe.
- The Proposed Timeline for Urgent Requests reflects a hard-fought compromise that members of the EPDP Phase 1 Implementation Review Team (which consists of stakeholders from across the ICANN community, including the GAC) can live with.
- The Proposed Timeline for Urgent Requests includes the following definition: “3.9 ‘Authenticated Requestor’ means a law enforcement requestor or trusted/competent authority that is authenticated through an authentication mechanism implemented **pursuant to ICANN Consensus Policy.**” [emphasis added]
- Council has already decided to recommend that the ICANN Board reject the SSAD (EPDP Phase 2) policy recommendations and that Supplemental Recommendations should be developed. This opens a procedural path to revise the recommendations around authenticating/accrediting requestors in general. Discussing an authentication mechanism for LEA requestors for the purpose of Urgent Requests can reasonably occur in this context and would be more efficient than discussing that matter in a separate, as-yet-to-be-determined, policy process.