ICANN Specific Reviews Q3 2023 Quarterly Report

- *Competition, Consumer Trust, and Consumer Choice Review (CCT)*
- *Second Registration Directory Service Review (RDS-WHOIS2)*
- *Third Accountability and Transparency Review (ATRT3)*
- *Second Security, Stability, and Resiliency of the DNS Review (SSR2)*

30 September 2023

Purpose of This Document

The purpose of this document is to provide an update on the status of Specific Reviews at the end of the third calendar quarter of 2023, including but not limited to:
- The status of, and progress made in implementing Board-approved Specific Reviews recommendations.
- The status of recommendations pending prioritization.
- The status of recommendations pending Board consideration.

This report contains information on the implementation strategy and plans for those recommendations in "in progress" and "not started" status. Additionally, the report documents the Board rationale for rejecting recommendations.

The quarterly report complements the Annual Reviews Implementation Report (included in the [Annual Report](#)) and serves to capture implementation highlights as the ICANN organization (org) progresses through implementation.

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Specific Reviews

ICANN's four Specific Reviews are anchored in Article 4.6 of ICANN's Bylaws[1] and serve to assess how certain aspects of the ICANN ecosystem are performing, including how the ICANN org, Board, and community fulfill various commitments. Specific Reviews are critical to maintaining a healthy multistakeholder model.

The review efforts are conducted by community members and supported by ICANN org. The Operating Standards for Specific Reviews provide more information on the Reviews process.

Accountability and Transparency Review **ATRT**	Periodic review of ICANN's execution of its commitment to maintain and improve robust mechanisms for public input, accountability, and transparency so as to ensure that the outcomes of its decision-making reflect the public interest and are accountable to the Internet community.
Competition, Consumer Trust, and Consumer Choice Review **CCT**	Review of the extent to which the expansion of generic top-level domains (gTLDs) has promoted competition, consumer trust, and consumer choice. It also assesses the effectiveness of the New gTLD Round's application and evaluation process, as well as the safeguards put in place to mitigate possible issues arising from the New gTLD Round.
Registration Directory Service Review **RDS**	Periodic review of the effectiveness of the gTLD registry directory service and whether its implementation meets the legitimate needs of law enforcement, promotes consumer trust, and safeguards registrant data.
Security, Stability, and Resiliency Review **SSR**	Periodic review of ICANN's execution of its commitment to enhance the operational stability, reliability, resiliency, security, and global interoperability of the systems and processes that are affected by the Internet's system of unique identifiers that ICANN coordinates.

The ICANN Board of Directors performs oversight of Specific Reviews through its Organizational Effectiveness Committee (OEC).

As summarized in the table below, ICANN org has conducted multiple iterations of the Specific Reviews over the years. The most recent four review efforts have now concluded, and the Board has taken action[2] on all final reports.

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[1] Specific Reviews originate from the Affirmation of Commitments (AoC) document ICANN org signed with the United States Department of Commerce in 2009. Further to a recommendation made by the Cross-Community Working Group on Enhancing ICANN Accountability (Work Stream 1), AoC Reviews were incorporated into ICANN's Bylaws in May 2016 as a result of the IANA Stewardship Transition.

[2] As stipulated in Section 4.6 of ICANN's Bylaws, the Board is required to take action on a review team's final report within six months of receipt. Board action on a review team's final report is informed by a public comment period.

Review	Iteration	# of Recs. Issued
Accountability and Transparency Review	**ATRT3**	15 See Final Report
	ATRT2 [ARCHIVED]	
	ATRT1 [ARCHIVED]	
Competition, Consumer Trust, and Consumer Choice Review	**CCT**	35 See Final Report
Registration Directory Service[3] Review	**RDS-WHOIS2**	22 See Final Report
	WHOIS1 [ARCHIVED]	
Security, Stability, and Resiliency Review	**SSR2**	63 See Final Report
	SSR1 [ARCHIVED]	
Specific Reviews Recommendations		135

Status of Specific Reviews Recommendations

The Q3 2023 status of Board action on Specific Reviews recommendations is summarized in the following table:

Q3 2023 - Status of Specific Reviews					
Review	**# of Recs.**	**Approved** (in whole or in part)	**Pending Board Consideration**	**Passed through** (in whole or in part)	**Rejected**
ATRT3	15	15	N/A	N/A	N/A
CCT	35	17	4	14	2
RDS-WHOIS2	22	15	4	2	2
SSR2	63	24	1	N/A	38
Total	**135**	**71**	**9**	**16**	**42**

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[3] The Registration Directory Service Review was formerly known as "WHOIS Policy Review," shortened to "WHOIS." For any subsequent review effort, as appropriate, the review effort will be renamed to RDS with RDS3 being the new acronym.

Highlights in the Q3 2023 include [Board action](#), on 10 September 2023, to move a set of two CCT and nine SSR2 recommendations out of pending status. The Board resolved to approve one SSR2 recommendation as fully implemented, and to reject eight SSR2 recommendations, and CCT recommendations, as documented in the [Board scorecard](#) associated with the Board action.

Board-approved recommendations are subject to prioritization. However, there are instances where the Board approved recommendations as fully implemented. For language of recommendations the Board approved, refer to [Appendix A: Board-Approved ATRT3 Recommendations](#), [Appendix B: Board-Approved CCT Recommendations](#), [Appendix F: Board-Approved RDS-WHOIS2 Recommendations](#), and [Appendix J: Board-Approved SSR2 Recommendations](#).

Any Board Specific Reviews recommendation considered eligible for prioritization (i.e. not tied to dependencies) is submitted to the community prioritization group for feedback, to inform implementation planning and design[4]. The [Appendix M: Prioritization Process](#) contains more details on the prioritization process. Recommendations pending prioritization, including rationale for their status, are stated in the relevant review sections below.

For any recommendation placed in the pending category, the Board is committed to taking further action as soon as data and/or information required to inform Board action (as respectively documented in the scorecards[5] associated with Board actions) have been collected, or dependencies have been appropriately resolved or addressed. To review language of the nine recommendations that are still pending Board consideration, refer to [Appendix D: CCT Recommendations Pending Board Consideration](#), [Appendix H: RDS-WHOIS2 Recommendations Pending Board Consideration](#), and [Appendix K: SSR2 Recommendation Pending Board Consideration](#).

The Board action to pass recommendations through to community groups "is not a directive that the groups identified should formally address any of the issues within those recommendations". The Board considered that "it is within the purview of each group to identify whether work will be taken on and the topics that the group will address." To review the language of recommendations that were passed through to community groups, refer to [Appendix C: Passed-Through CCT Recommendations](#) and [Appendix G: Passed-Through RDS-WHOIS2 Recommendations](#).

Any recommendation the Board rejects is accompanied by rationale. To read more about recommendations the Board rejected and associated rationale, refer to [Appendix E: Rejected CCT Recommendations](#), [Appendix I: Rejected RDS-WHOIS2 Recommendations](#), and [Appendix L: Rejected SSR2 Recommendations](#).

Implementation Status of Board Approved Specific Reviews Recommendations

ICANN org continues to implement, move towards implementation or prioritization, and to document implementation of, where and when appropriate, the set of 71 Board approved Specific Reviews recommendations that emerged from the ATRT3, CCT, RDS-WHOIS2 and SSR2 reviews.

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[4] Implementation design is the preparatory phase for implementation during which a cross-functional project team develops guidelines that include deliverables for implementation, costing out resources, risk assessment, as well as an inventory of existing work etc.

[5] When taking action on consensus recommendations emerging from a Specific Review, Board action structures its determination and rationale for each recommendation via a scorecard that allows for ease of reference.

To structure its reporting, ICANN org uses the following implementation statuses and color-coding:

- Complete: A recommendation's intent which is considered implemented or addressed and for which implementation documentation[6] is available.
- In progress: A recommendation for which work has started to address deliverables identified during the implementation design.
- Not started: Work has not started due to, for instance, a dependency on another recommendation and/or process.

The table below provides an overview of the status of prioritized, and non-prioritized, Specific Reviews recommendations in Q3 2023:

Implementation Status of Board-Approved Specific Reviews Recommendations – Q3-2023 Status	ATRT3	CCT	RDS-WHOIS2	SSR2	# of Recs.
Implementation complete	4	5	8	13	30
Implementation in progress	11	12	3	8	34
Implementation not started	0	0	4	3	7
Number of Recommendations	15	17	15	24	71

This progress translates into the following percentage:
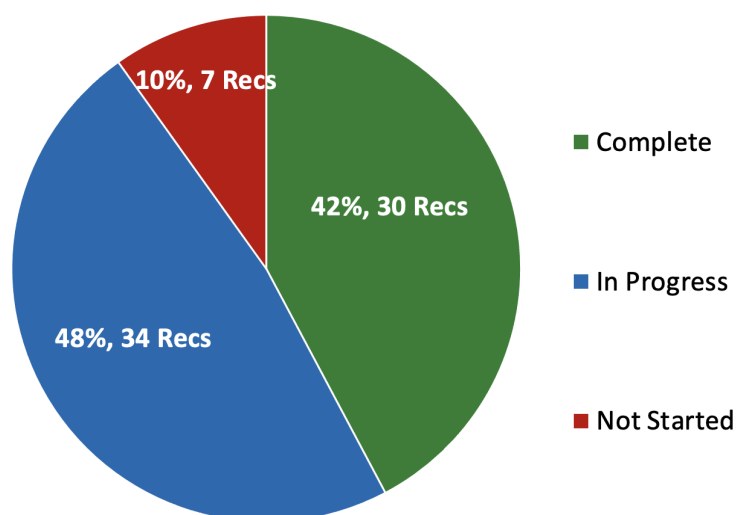
Implementation Status of Board-Approved Specific Reviews Recommendations (September 2023)

This translates into the following list of recommendations:

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[6] Implementation documentation provides evidence of the implementation, and rationale for why improvements were operationalized the way they were.

Board-Approved Specific Reviews Recommendations - Q3-2023 Status	
Complete[7] (30 Recs.)	***ATRT3***: 1.1, 1.2, 3.1, 3.3 ***CCT***: 16, 17, 18, 30, 31 ***RDS-WHOIS2***: 1.1, 1.2, 1.3, 11.2, 15.1, LE.1, LE.2, CC.3 ***SSR2***: 3.2, 3.3, 4.1, 7.1, 7.2, 7.3, 9.1, 10.1, 11.1, 13.2, 16.1, 24.1, 24.2
In Progress (34 Recs.)	***ATRT3***: 2, 3.2, 3.4, 3.5, 3.6, 4.1, 4.2, 4.3, 4.4, 4.5, 5 ***CCT***: 1, 6, 7, 8, 11, 13, 20, 21, 22, 23, 24, 26 ***RDS-WHOIS2***: 3.1, SG.1, CC.2 ***SSR2***: 1.1, 5.1, 5.2, 5.3, 7.5, 21.1, 22.1, 23.2

Not Started (7 Recs.)	*To Begin (2 Recs.)*	***RDS-WHOIS2***: CC.1 ***SSR2***: 5.4
	Due to Dependencies (5 Recs.)	***RDS-WHOIS2***: 3.2, 10.2, 12.1 ***SSR2****: 22.2, 23.1

The tables and charts below capture implementation status of recommendations:
- Prior to the kickoff of the FY23 Pilot Prioritization (April 2022).
- After the FY23 Pilot Prioritization (June 2022).
- At the end of each calendar quarter since Q3 2022.

Status of Board-Approved Specific Reviews Recommendations - Q3-2023 Status	Apr 22	Jun 22	Sept 22	Dec 22	Mar 23	Jun 23	Sept 23
Complete	9	15	16	26	28	29	30
In Progress	11	15	17	24	31	34	34
Not Started	41	31	28	20	11	7	7
Number of Recommendations	61	61	61	70[8]	70	70	71[9]

This translates into the following percentage:

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[7] Recommendations with a hyperlink are those for which implementation documentation is available.
[8] On 16 November 2022, the Board took action on 21 SSR2 recommendations pending Board consideration.
[9] On 10 September 2023, the Board took action on 11 CCT and SSR2 recommendations pending Board consideration.
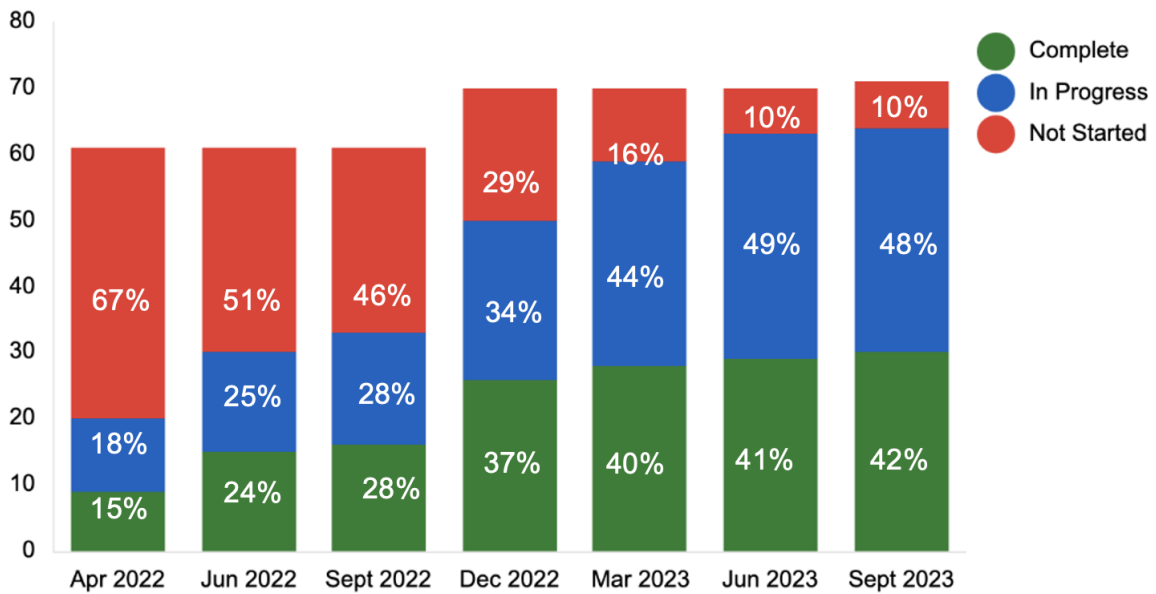
While a number of recommendations moved to "complete" or "in progress" since the FY23 Pilot Prioritization, a number of Specific Reviews recommendations remains to be implemented by ICANN org. Progress per quarter across the four Specific Reviews is as follows:

Status of Board-Approved Specific Reviews Recommendations - Q3 2023 Status		May 22	Jun 22	Sept 22	Dec 22	Mar 23	Jun 23	Sept 23	%	Overall Progress of Completion
ATRT3	Complete	1	3	4	4	4	4	4	27%	46%
	In Progress	1	4	4	5	10	11	11	73%	
	Not Started	13	8	7	6	1	0	0	N/A	
CCT	Complete	3	3	3	4	5	5	5	29%	65%
	In Progress	4	4	5	10	12	12	12	71%	
	Not Started	10	10	9	3	0	0	0	N/A	
RDS-WHOIS 2	Complete	3	7	7	8	8	8	8	53%	81%
	In Progress	6	2	2	2	2	3	3	20%	
	Not Started	6	6	6	5	5	4	4	27%	
SSR2	Complete	2	2	2	9	11	12	13	54%	70%
	In Progress	0	5	6	6	7	8	8	33%	
	Not Started	12	7	6	8	5	3	3	13%	

Progress of completion also translates as follows:
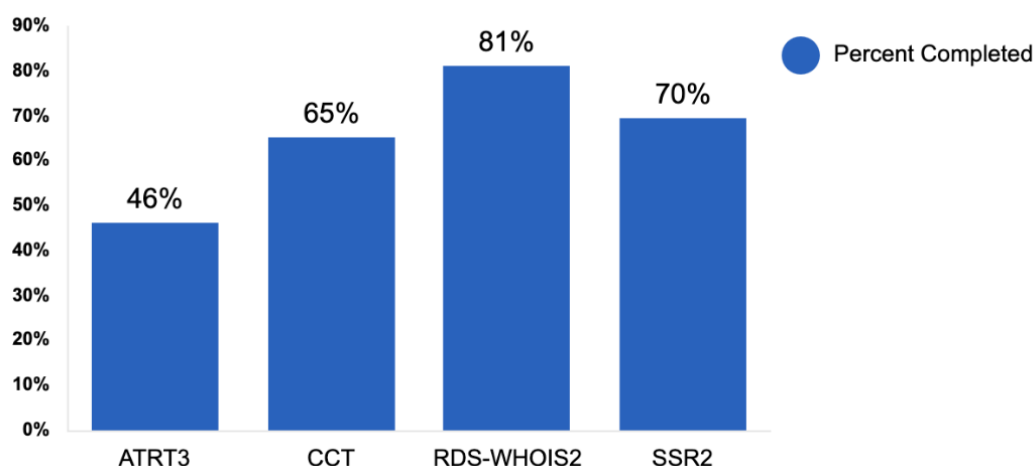
Progress of Completion[10] per Specific Review (September 2023)

In some instances, community input is needed to conduct the implementation work, as detailed in sections below.

The following tables show recommendations that were divided into components to streamline their implementation or regrouped into implementation buckets to streamline efforts and centralize requests made to the ICANN community.

The same tables provide an overview of the expected completion dates for recommendations and their components which are in "in progress" or in "not started" status as recorded in the internal, cross-functional project plan. Recommendations are listed per priority label assigned by the community prioritization group, where P1 corresponds to the highest priority and P4 the lowest.

Board-Approved Specific Reviews Recommendations - Recommendation Components[11] in Implementation – Q3 2023 Status				
Prioritized by the Community Group as *P1 = Highest Priority – Urgent/Important*				
Specific Review	Rec./ Components	Q2 2023 Status	**Q3 2023 Status**	Tentative Completion
ATRT3	3.2	In progress	In progress	Q2 2024
ATRT3	3.4	In progress	In progress	Q2 2024
ATRT3	3.5	In progress	In progress	Q4 2026
CCT	1	In progress	In progress	Q1 2024
CCT	8, 11, 13 (items 1, 2, 4 in part)	In progress	In progress	Q2 2024

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[10] This measures the percentage of effort toward completion of the recommendations.

[11] Note that in subsequent iterations of this report, the table will include the status of the past quarter as a point of reference and that any alterations to the tentative completion date will be reported on.

Specific Review	Rec./ Components	Q2 2023 Status	Q3 2023 Status	Tentative Completion
SSR2	21.1	In progress	In progress	Q1 2024
SSR2	23.2	In progress	In progress	Q1 2024

Prioritized by the Community Group as P2 = *Less Urgent/Important*				
Specific Review	Rec./ Components	Q2 2023 Status	**Q3 2023 Status**	Tentative Completion
ATRT3	3.6	In progress	In progress	Q2 2024
ATRT3	4.1	In progress	In progress	Q1 2025
ATRT3	4.2	In progress	In progress	Q1 2025
ATRT3	4.3	In progress	In progress	Q1 2025
ATRT3	4.4	In progress	In progress	Q2 2025
ATRT3	4.5	In progress	In progress	Q2 2025
CCT	6	In progress	In progress	Q2 2024
CCT	13 item 3	In progress	In progress	Q4 2024
CCT	13 (items 4 in part, 5), 20, 23 (items A, C in part, D), 24 (item B)	In progress	In progress	Q2 2024
CCT	21 item 2	In progress	In progress	Q4 2023
CCT	22	In progress	In progress	Q2 2024
CCT	23 item B	In progress	In progress	Q1 2024
CCT	26	In progress	In progress	Q2 2024
RDS-WHOIS2	SG.1	In progress	In progress	Q4 2023

Prioritized by the Community Group as P3 = *Urgent/Less Important*				
Specific Review	Rec./ Components	Q2 2023 Status	**Q3 2023 Status**	Tentative Completion
SSR2	23.1	Not started	Not started	Q4 2024
SSR2	5.3	In progress	In progress	Q4 2023

Prioritized by the Community Group as P4 = Less *Urgent/Less Important*				
Specific Review	Rec./ Components	Q2 2023 Status	**Q3 2023 Status**	Tentative Completion

ATRT3	2	In progress	In progress	Q4 2023
CCT	7	In progress	In progress	Q2 2024
RDS-WHOIS2	3.1	In progress	In progress	Q1 2024
RDS-WHOIS2	CC.1	Not started	Not started	Q3 2024
SSR2	1.1	In progress	In progress	Q1 2024
SSR2	5.4	Not started	Not started	To be determined – implementation design in progress.
SSR2	7.5	In progress	In progress	To be determined – implementation design in progress.
SSR2	22.1	In progress	In progress	Q4 2023
SSR2	22.2	Not started	Not started	Q4 2023

Prioritized				
Specific Review	Rec./ Components	Q2 2023 Status	**Q3 2023 Status**	Tentative Completion
ATRT	5	In progress	In progress	Q4 2023

Not Eligible for Prioritization				
Specific Review	Rec./ Components	Q2 2023 Status	**Q3 2023 Status**	Tentative Completion
RDS-WHOIS2	3.2	Not started	Not started	n/a
RDS-WHOIS2	10.2	Not started	Not started	n/a
RDS-WHOIS2	12.1	Not started	Not started	n/a
RDS-WHOIS2	CC.2	In progress	In progress	n/a

Third Accountability and Transparency Review (ATRT3)

Status of ATRT3 Review

On 30 November 2020, the Board took action to approve the 15 recommendations contained in the Third Accountability and Transparency Review Team (ATRT3)'s Final Report. See the Board Scorecard for more information.

All recommendations were approved subject to prioritization with the exception of Recommendation 5. Recommendation 5 required the development of the prioritization process and therefore, was considered prioritized.

The ATRT3 recommendations called for updates to the requirements of ICANN's Public Comment proceedings, the creation of a community-led group tasked with operating a prioritization process, as well as changes to Specific and Organizational Reviews, including the creation of a new Holistic Review of ICANN structure, and the evolution of Organizational Reviews into continuous improvement programs.

Board Action on ATRT3 – 5 Recommendations (divided into 15 components) Q3-2023 Status	
Approve	1 (Recommendation 5)
Approve subject to prioritization	4 (14 Recommendation components 1.1, 1.2, 2, 3.1, 3.2, 3.3, 3.4, 3.5, 3.6, 4.1, 4.2, 4.3, 4.4, 4.5)

Refer to Appendix A: Board-Approved ATRT3 Recommendations for the full language of Board-approved recommendations.

Prioritization Status of ATRT3 Recommendations

As articulated in the table below, 13 recommendations were put forward for prioritization and prioritized in the FY23 Pilot Prioritization:

Board Approved ATRT3 Recommendations – 15 Recommendation Components Q3-2023 Prioritization Status		
Rec. / Rec. Component	**ICANN Org Proposed Prioritization**	**Priority Assigned by Community Group**
1.1	P4 = *Lowest Priority-Less Urgent/Important*	P2 = *Less Urgent/Important*
1.2	P4 = *Lowest Priority-Less Urgent/Important*	P2 = *Less Urgent/Important*
2	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
3.1	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
3.2	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*

3.4	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
3.5	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
3.6	P1 = *Highest Priority-Urgent/ Important*	P2 = *Less Urgent/Important*
4.1	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
4.2	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
4.3	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
4.4	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
4.5	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*

N/A	
Rec. / Rec. Component	**Rationale**
3.3	Recommendation complete. See [implementation documentation](#).
5	Recommendation prioritized.

Refer to [Appendix A: Board-Approved ATRT3 Recommendations](#) for recommendation language and to [Implementation Status of ATRT3 Recommendations](#) for information on the status of the recommendations.

Implementation Status of ATRT3 Recommendations

This section presents updates on implementation status of Board-approved ATRT3 Recommendations, including estimated implementation completion dates, where available, and links to implementation documentation produced by ICANN org.
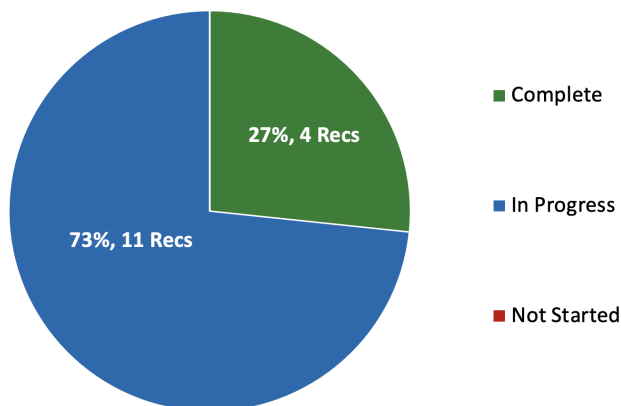
The following table shows the status of the previous quarter against the last quarter. A strikethrough indicates a change to the initial, tentative completion date.

"P. Label" in the table below corresponds to the prioritization label assigned by the community group. Any recommendation or recommendation component that was not included in the prioritization process for reasons articulated in the [Prioritization of Board-Approved ATRT3 Recommendations](#) section is recorded as N/A in the "P. Label" column.

[Appendix A: Board-Approved ATRT3 Recommendations](#) contains the full text of each recommendation.

Board-Approved ATRT3 Recommendations – Recommendation Components Q3-2023 Status			
Rec. / Rec. Component	**P. Label**	**Complete**	**Implementation Information**
1.1	P2	Completed in Q3 2021	[Implementation Documentation](#)
1.2	P2	Completed in Q3 2021	[Implementation Documentation](#)
3.1	P1	Completed in Q4 2022	[Implementation Documentation](#)
3.3	N/A	Completed in Q1 2022	[Implementation Documentation](#)

Rec.	P. Label	Q2 2023 Implementation Status	Q3 2023 Implementation Status	Estimated Completion Date
2	P4	In progress	In progress	~~Q1~~ Q4 2023
3.2	P1	In progress	In progress	~~Q4 2025~~ Q2 2024
3.4	P1	In progress	In progress	~~Q4 2025~~ Q2 2024
3.5	P1	In progress	In progress	~~Q4 2025~~ Q4 2026
3.6	P2	In progress	In progress	~~Q4 2023~~ Q2 2024
4.1	P2	In progress	In progress	~~Q2 2024~~ Q1 2025
4.2	P2	In progress	In progress	~~Q2 2024~~ Q1 2025
4.4	P2	In progress	In progress	~~Q2 2024~~ Q1 2025
4.3	P2	In progress	In progress	~~Q2 2024~~ Q4 2023
4.5	P2	In progress	In progress	~~Q2 2024~~ Q1 2025
5	N/A	In progress	In progress	~~Q1~~ Q4 2023

Pie chart legend:
- Complete
- In Progress
- Not Started

27%, 4 Recs — Complete
73%, 11 Recs — In Progress

Progress of Completion – Current vs. Planned [12]: -12%

The overall implementation progress of Board-approved ATRT3 recommendations (September 2023) is summarized in the graph below[13].

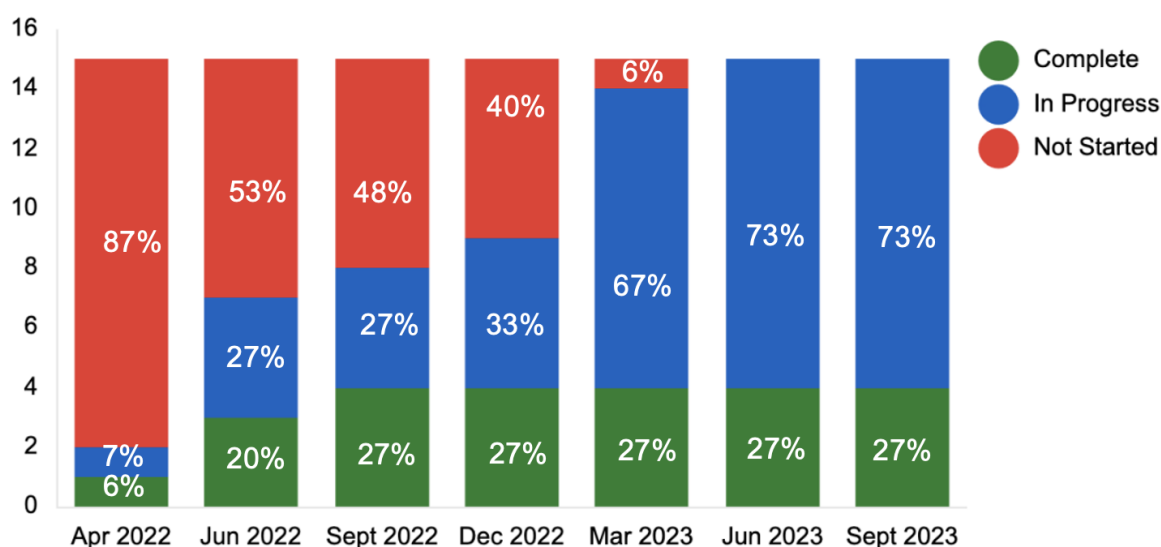| Rec.	% Complete
Rec. 01.1	100%
Rec. 01.2	100%
Rec. 02	81%
Rec. 03.1	100%
Rec. 03.2	3%
Rec. 03.3	100%
Rec. 03.4	14%
Rec. 03.5	32%
Rec. 03.6	14%
Rec. 04.1	45%
Rec. 04.2	45%
Rec. 04.3	45%
Rec. 04.4	18%
Rec. 04.5	18%
Rec. 05	96%
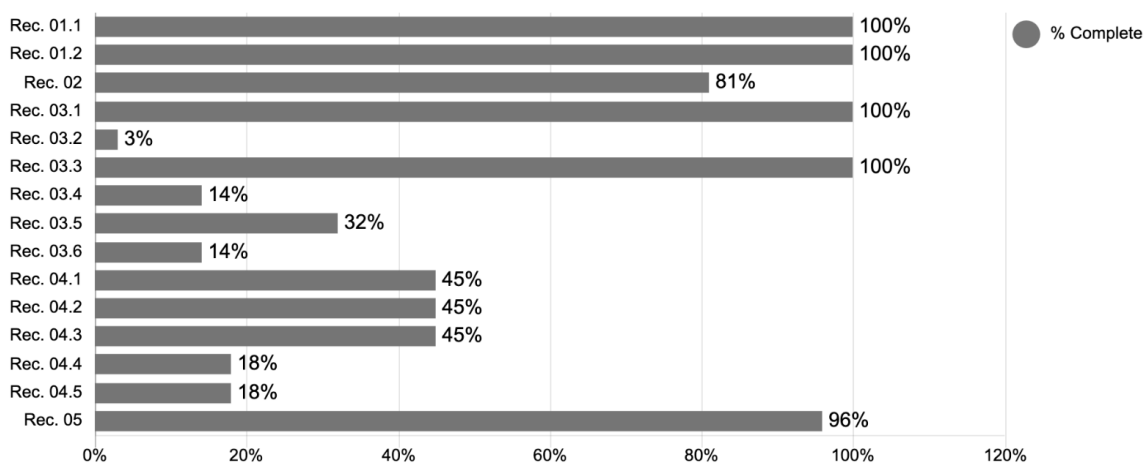
Since the FY23 prioritization concluded, progress of implementation status over past

[12] The progress of completion current vs. planned is an indicator that is measuring "on-time delivery" by indicating whether the work is progressing according to the time frame set when the work plan was developed. This indicator is impacted by progress of the work as well as by changes to the work plan. The indicator shows negative if less work has been completed than originally time-planned. The indicator shows positive if the work completed is ahead of the original plan/schedule.
[13] This chart is not indicative of the difference in level of effort for each recommendation.

quarters in calendar year 2022 and in 2023 is as follows:

Implementation Status of Board-Approved ATRT3 Recommendations (September 2023)

Status of Board-Approved ATRT3 Recommendation Components - Q3 2023 Status	May 22	Jun 22	Sept 22	Dec 22	Mar 23	Jun 23	Sept 23
Complete	1	3	4	4	4	4	4
In Progress	1	4	4	5	10	11	11
Not Started	13	8	7	6	1	0	0

Four out of the 15 Board-approved ATRT3 recommendation components are complete:

- Labeled as P2 by the community group during prioritization, **ATRT3 Recommendations 1.1 and 1.2** identify improvements needed for collecting community feedback. During implementation design, the cross-functional project team determined ATRT3 Recommendations 1.1 and 1.2 to be complete to the extent possible, primarily through the Information Transparency Initiative launch of the new Public Comment proceeding features. Implementation activities were documented accordingly in ATRT3 1.1–1.2 Implementation Documentation.

- Prioritized as P1 by the community group, **ATRT3 Recommendation 3.1** calls for future RDS Reviews to be suspended until the next ATRT can consider the future of these reviews. In September 2022, the ICANN Board deferred the third RDS Review to allow the community and ICANN org sufficient time to plan for and implement pertinent ATRT3 recommendations that were prioritized for implementation. Recognizing the Bylaws requirement that the RDS Review should be conducted every five years, the Board suspended RDS3 until the next ATRT can make a determination on future RDS reviews, as recommended in ATRT3 Recommendation 3.1. The Board will oversee the implementation of ATRT3 recommendations and determine whether the timing of the RDS3 should be re-examined based on the changing environment, including various dependencies such as the ongoing work related to the EPDP Phase 2 Final Report recommendations, including the proposed System for Standardized Access/Disclosure (SSAD). ATRT3 Recommendation 3.1

was moved to complete accordingly. [ATRT3 3.1 Implementation Documentation](#) includes additional information and detail.

- **ATRT3 Recommendation 3.3**, which recommends suspending future Security, Stability, and Resiliency (SSR) Reviews until the next ATRT can consider the future of these reviews, was completed in March 2022, and therefore, not included in the FY23 prioritization. Activities and rationale toward the deferral of the SSR3 Review are detailed in the [ATRT3 3.3 Implementation Documentation](#).

Eleven of the 15 ATRT3 recommendation components are in progress:

- Prioritized as P4 during the FY23 prioritization, **ATRT3 Recommendation 2** calls for ICANN org to re-examine ATRT2 implementation in light of the ATRT3 assessment, and to complete implementation subject to prioritization. Work started in June 2022 to address ATRT3 Recommendation 2. With the gap analysis now complete, in Q1 2023 subject matter experts were engaged on re-labeling the implementation status of ATRT2 recommendations with accompanying rationale, and in identifying new actions, as required. This work continued in Q3 2023 and ICANN org now foresees the conclusions of these activities in Q4 2023 with the release of a report. Any action resulting from this work will be subject to prioritization, as recommended by the ATRT3.

- Work is underway to address modifications needed to Section 4.6 of the ICANN Bylaws to amend the timing, duration, and occurrence of the next CCT Review, as articulated in **ATRT3 Recommendation 3.2**. To the extent possible, the implementation of this recommendation, prioritized by the community group as P1, will be coordinated with the other modifications to the ICANN Bylaws pertaining to Specific Reviews. Once the Bylaws amendments are approved, ICANN org will update the [Operating Standards for Specific Reviews](#) accordingly. The implementation activities of ATRT3 Recommendations 3.5 (see details below) may have an impact on outcomes of ATRT3 Recommendation 3.2. Redlines to the applicable sections of the ICANN Bylaws and Operating Standards for Specific Reviews were drafted by ICANN org, ready to be implemented once all other ATRT3 recommendations that require Bylaws modifications develop further.

- Similar to ATRT3 Recommendation 3.2, **ATRT3 Recommendation 3.4** prompts amendments to ICANN's Bylaws. The improvements will need to be mirrored into the [Operating Standards for Specific Reviews](#) once the Bylaws amendments are approved. The implementation activities of ATRT3 Recommendations 3.5 and 3.6 (see details below) may have an impact on outcomes of ATRT3 Recommendation 3.4 which was prioritized as a P1 recommendation. Redlines to the applicable sections of the ICANN Bylaws and Operating Standards for Specific Reviews were drafted by ICANN org, ready to be implemented once all other ATRT3 recommendations that require Bylaws modifications develop further.

- Work to identify a way forward for the Pilot Holistic Review derived from Board action on **ATRT3 Recommendation 3.5** continued in Q3 2023. ICANN org supported the Pilot Holistic Review Terms of Reference Development Team, composed of former ATRT3 members and Board members, in finalizing revisions to the draft ToR to address the [community comments](#) received in Q3-Q4 2022 during the public comment on the first draft of the Pilot Holistic Review Terms of Reference (ToR). The Pilot Holistic Review Terms of Reference Development Team held an informational [webinar](#) on 21 August 2023 to present its revisions to the community and collect input. Following a positive community response during the webinar, the OEC

provided an update to the Board at its Istanbul Workshop on 9 September 2023 and recommended opening a Public Comment proceeding. A [Public Comment proceeding](#) on the updated Pilot Holistic Review Revised Draft ToR opened on 28 September 2023 and will run through 27 November 2023. The Staff Report is scheduled for publication on 11 December 2023. The Board will then decide the next steps on the Pilot Holistic Review in Q1 2024.

- Prioritized as P2 by the community group, the **ATRT3 Recommendation 3.6** calls for Organizational Reviews[14] to be evolved into a continuous improvement program. The Board directed ICANN org to initiate the development of a project plan to implement a pilot Continuous Improvement Program (CIP) to ensure it yields the outcomes intended by the ATRT3 before a Bylaws amendment is completed. In Q3 2023, ICANN org conducted preliminary research regarding third-party case studies for the development of a Continuous Improvement Program, and surveys. Two calls were held with external experts and internal resources regarding the possibility of using a community coordination group to develop the CIP Framework. ICANN org is preparing to start the work of designing and implementing the Continuous Improvement Program with the ICANN community, including the development of a CIP Framework (an estimated 12 months duration, beginning in November 2023 and concluding by December 2024). Additional engagement during Q3 2023 included an update to the Supporting Organizations Advisory Committees (SOAC) Roundtable on 29 September 2023, and correspondence to the community for appointment of representatives to the Community Coordination Group for CIP (CIP-CCG). ICANN org met with and presented to the ccNSO Guidelines Review Committee (GRC) to develop a new "Open Space" session dedicated to the topic of continuous improvement and the implementation of ATRT3 Rec. 3.6. ICANN org's Reviews Operations & Accountability team will continue to provide virtual and in-person engagement sessions on ICANN Reviews, including sessions with the community during ICANN78 to build awareness of upcoming review-related work, including the CIP.

- In Q3 2023, work progressed on **ATRT3 Recommendations 4.1, 4.2, 4.3, 4.4, and 4.5**. Labeled as P2, the recommendations suggest enhancements to the accountability and transparency of ICANN's Strategic and Operating Plans. As part of the development of the FY25-29 Operating Plan and Budget, during Q3 2023 the planning team engaged with the org on each Operating Initiative and strategic projects that contribute to the Strategic Plan. ICANN org is in the process of developing detailed plans for the work related to progress measurement and reporting. This is a multi year project that includes engagement with the org, Board and the community. The work on this project is expected to take place during both FY24 and FY25.

- As noted in the [Appendix M: Prioritization Process](#), work has been underway to address **ATRT3 Recommendation 5**, and its suggested prioritization process, since April 2021. Recommendation 5, given its nature and content, was considered prioritized from the start by ICANN org. Prioritization is now an integrated component of the annual planning process and runs on a set cadence, as documented in [version 3](#) of the Planning Prioritization Framework (released in March 2023). ICANN org has worked to build prioritization into the Planning cycle through the planning prioritization framework which incorporates input received during multiple community consultations. Org ran a FY23 pilot in May 2022, a FY24 prioritization process in

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[14] [Organizational Reviews](#) are anchored in Article 4.4. of the ICANN Bylaws to assess the effectiveness of ICANN's supporting organizations and advisory committees.

October–November 2022 and recently concluded the FY25 prioritization cycle in Q2 2023.

ATRT3 Recommendation 5 also suggests the establishment of a process for retiring recommendations. In Q3 2023, ICANN org presented its [draft process to retire recommendations](#) to SO/AC leadership and agreed to open a [consultation](#) on the process. The OEC is scheduled to discuss any community feedback received on the process at its December 2023 meeting. The recommendation is expected to complete in Q4 2023 with inclusion of the agreed process into a revised version 4 of the prioritization framework.

Competition, Consumer Trust, and Consumer Choice Review (CCT)

Status of CCT Review

On 1 March 2019, the Board took action on the CCT Review Team's 35 consensus recommendations contained in the Final Report, as documented in the associated March 2019 Scorecard.

The Board-approved six recommendations, subject to costing and implementation considerations. In January 2020, the Board directed ICANN org to commence implementation of the approved CCT recommendations, as proposed in the Plan for Implementation[15] prepared by ICANN org, with a note that any recommendations requiring significant resources and budget would be included in the operational planning and budgeting processes, allowing for appropriate community consideration and prioritization, as applicable, of planned work.

Informed by the "Informing Board Action on CCT Pending Recommendations" assessment, on 22 October 2020 the Board took action to approve 11 of the 17 recommendations that were initially placed in pending, subject to prioritization, as detailed in the October 2020 Scorecard.

On 10 September 2023, the Board took action on two additional pending recommendations, as documented in the associated scorecard.

The Board-approved CCT recommendations call for improved data collection, suggested reforms relating to transparency and data collection within ICANN Contractual Compliance, as well as engagement work.

Board Action on CCT – 35 Recommendations Q3-2023 Status	
Approve (in whole or in part) subject to prioritization	17 (Recommendations 1, 6, 7, 8, 11, 13, 16 in part, 17, 18, 20 in part, 21, 22, 23, 24, 26, 30, 31)
Pending Board consideration	4 (Recommendations 2, 3, 4, 5)
Pass-through (in whole or in part)[16] to community groups	14 (Recommendations 9, 10, 12, 16 in part, 19, 20 in part, 25, 27, 28, 29, 32, 33, 34, 35)
Rejected	2 (Recommendation 14, 15)

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[15] A proposed plan for implementation and set of next steps was submitted for Public Comment to inform Board approval of the plan.

[16] "In passing these recommendations through, the Board is neither accepting, nor rejecting the recommendations. For each of these recommendations, [...], the Board is careful to respect the remit and roles of the different part of the ICANN community and is not directing Board or ICANN org action that would usurp another group's remit. Each of these recommendations, either in whole or in part, calls for work or outcomes that are outside of the Board's remit to direct, and are contingent on community work. The Board is not in a position to direct that the community groups come to any particular outcome, nor is the Board initiating any policy development work."

Refer to [Appendix B: Board-Approved CCT Recommendations](#) for the full language of Board-approved recommendations, [Appendix C: Passed-Through CCT Recommendations](#) for more information on recommendations passed through to community groups identified by the CCT, [Appendix D: CCT Recommendations Pending Board Consideration](#) for recommendations the Board still needs to consider, and [Appendix E: Rejected CCT Recommendations](#) for details on, including rationale, recommendations the Board rejected.

Status of CCT Recommendations Pending Board Consideration

To inform Board action on Recommendations 2, 3, 4, and 5, which call for data collection on domain name pricing and market, ICANN org commissioned a study, as directed by the ICANN Board, "to identify what types of data would be relevant in examining the potential impacts on competition and, whether that data is available, and how it could be collected in order to benefit the work of future CCT Review Teams." Results of the study, including org's determination, and identification of what information is already available, will tentatively be made available in Q4 2023.

Refer to [Appendix D: CCT Recommendations Pending Board Consideration](#) for the full language.

Prioritization Status of CCT Recommendations

As articulated in the table below, a set of 20 recommendation components was put forward for prioritization and prioritized in the [FY23 Pilot Prioritization](#). In some instances, recommendations were sliced into components and regrouped into implementation buckets in an effort to streamline efforts and centralize requests made to the ICANN community. The [Implementation Status of CCT Recommendations](#) offers more information on the regrouping.

Board Approved CCT Recommendations – 17 Recommendations/Recommendation components - Q3-2023 Prioritization Status		
Rec. / Rec. Component	**ICANN Org Proposed Prioritization**	**Priority Assigned by Community Group**
1	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
6	*P3 = Urgent/Less Important*	P2 = *Less Urgent/Important*
7	P2 = *Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
8	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
11	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
13 (items 1, 2, 4 in part)	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
13 (item 3)	*P3 = Urgent/Less Important*	P2 = *Less Urgent/Important*
13 (items 4 in part, 5)	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
20	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
21 (item 2)	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*

22	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
23 (items A, C in part, D)	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
23 item B	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
24 item B	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
26	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*

N/A	
Rec. / Rec. Component	**Rationale**
16	Recommendation complete. See [implementation documentation](#).
17	Recommendation complete. See [implementation documentation](#).
18	Recommendation complete. See [implementation documentation](#).
21 (items 1, 3, 4, 5, 6)	Recommendation components complete. Implementation documentation to be produced when full recommendation completes.
23 (items C in part, E)	Recommendation components complete. Implementation documentation to be produced when full recommendation completes.
24 (item A)	Recommendation component complete. Implementation documentation to be produced when full recommendation completes.
30	Recommendation complete. See [implementation documentation](#).
31	Recommendation complete. See [implementation documentation](#).

Refer to [Appendix B: Board-Approved CCT Recommendations](#) for recommendation language and to [Implementation Status of CCT Recommendations](#) for information on the status of the recommendations.

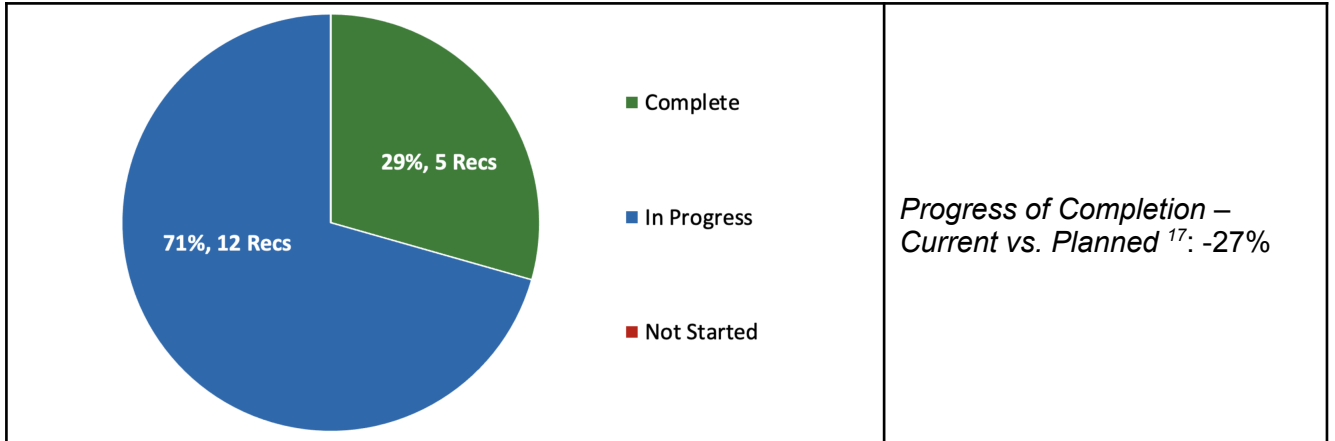## Implementation Status of CCT Recommendations

This section provides an update on Board-approved CCT Recommendations, including estimated implementation completion dates, where available, and links to implementation documentation produced by ICANN org.

The following table shows the status of the previous quarter against the last quarter. A strikethrough indicates a change to the tentative completion date.

"P. label" noted in the table below corresponds to the prioritization label assigned by the community group. In some instances, recommendations were divided into components to focus on the implementation effort at hand, while others were regrouped into implementation buckets to streamline efforts and centralize requests made to the ICANN community. Any recommendation or recommendation component that was not included in the prioritization process for reasons articulated in the [Prioritization of CCT Recommendations](#) section is recorded as N/A in the "P. Label."

Appendix B: Board-Approved CCT Recommendations contains the full text of each recommendation.

Board-Approved CCT Recommendations – Recommendation Components Q3-2023 Status				
Rec. / Rec. Component	**P. Label**	**Complete**		**Implementation Information**
16	N/A	Completed in N/A		Implementation Documentation
17	N/A	Completed in N/A		Implementation Documentation
18	N/A	Completed in N/A		Implementation Documentation
30	N/A	Completed in Q1 2023		Implementation Documentation
31	N/A	Completed in Q4 2022		Implementation Documentation
Rec. / Rec. Component	**P. Label**	**Q2 2023 Implementation Status**	**Q3 2023 Implementation Status**	**Estimated Completion Date**
1	P1	In progress	In progress	~~Q2 2024~~ Q1 2024
6	P2	In progress	In progress	~~Q3 2023~~ Q2 2024
7	P4	In progress	In progress	~~Q3 2023~~ Q2 2024
8	P1	In progress	In progress	~~Q3 2023~~ Q2 2024
11	P1	In progress	In progress	~~Q3 2023~~ Q2 2024
13 items 1, 2, 4 (in part)	P1	In progress	In progress	~~Q3 2023~~ Q2 2024
13 item 3	P2	In progress	In progress	~~Q3 2023~~ Q4 2024
13 items 4 (in part), 5	P2	In progress	In progress	~~Q2 2023~~ Q2 2024
20	P2	In progress	In progress	~~Q2 2023~~ Q2 2024
21 items 1, 3, 4, 5, 6	N/A	Complete	Complete	Will be documented as soon as 21 item 2 completes.
21 item 2	P2	In progress	In progress	~~Q3~~ Q4 2023
22	P2	In progress	In progress	~~Q1~~ Q2 2024
23 items A, C (in part), D	P2	In progress	In progress	~~Q2 2023~~ Q2 2024
23 item B	P2	In progress	In progress	~~Q2 2023~~ Q1 2024
23 items C (in part, E	N/A	Complete	Complete	Will be documented as soon as 23 items A, B, C (in part), D complete.
24 item A	N/A	Complete	Complete	Will be documented as soon as 24 item B completes.
24 item B	P2	In progress	In progress	~~Q2 2023~~ Q2 2024
26	P2	In progress	In progress	~~Q4 2023~~ Q2 2024

Progress of Completion –
Current vs. Planned [17]: -27%

The overall implementation progress of Board-Approved CCT Recommendations (September 2023) is summarized in the graph below[18].
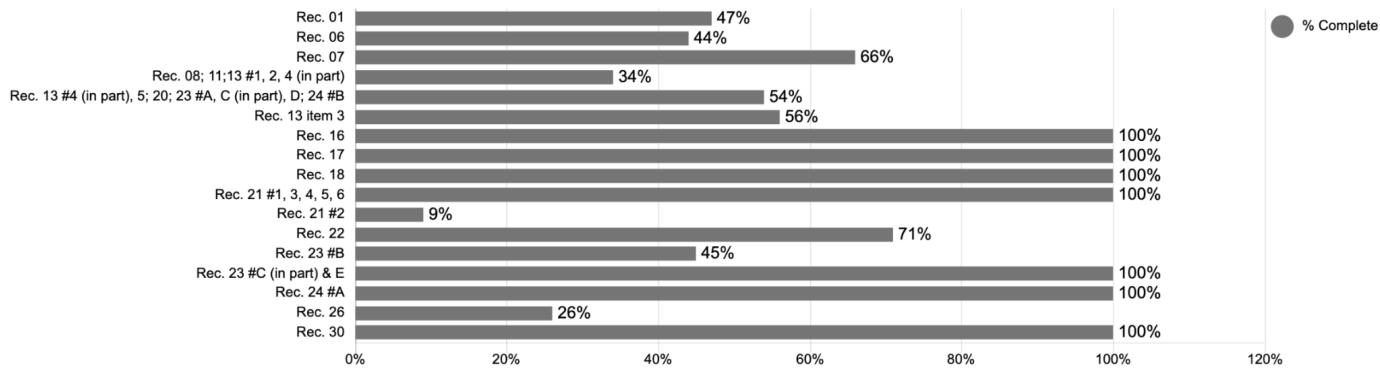
Since the FY23 prioritization concluded, progress of implementation status over past quarters in calendar year 2022 and in 2023 is as follows:

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[17] The progress of completion current vs. planned is an indicator that is measuring "on-time delivery" by indicating whether the work is progressing according to the time frame set when the work plan was developed. This indicator is impacted by progress of the work as well as by changes to the work plan. The indicator shows negative if less work has been completed than originally time-planned. The indicator shows positive if the work completed is ahead of the original plan/schedule.

[18] This chart is not indicative of the difference in level of effort for each recommendation.
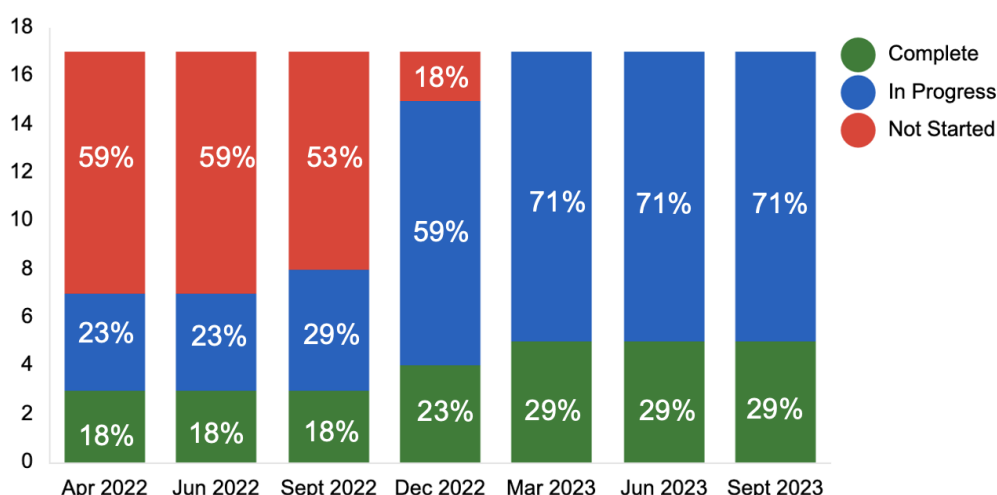
Implementation Status of Board-Approved CCT Recommendations (September 2023)

Status of Board-Approved CCT Recommendations Q3 2023 Status	May 22	Jun 22	Sept 22	Dec 22	Mar 23	Jun 23	Sept 23
Complete	3	3	3	4	5	5	5
In Progress	4	4	5	10	12	12	12
Not Started	10	10	9	3	0	0	0

Five out of the 17 Board-approved CCT Recommendations are complete in full:

- **CCT Recommendation 16** called for studying the relationship between specific registry operators, registrars, and Domain Name System (DNS) security abuse by commissioning ongoing data collection. ICANN org has been operating the Domain Abuse Activity Reporting (DAAR) and publishing the results for more than three years. Moreover, ICANN org has established a group within the Office of the CTO dedicated to researching SSR-related issues, including a focus on DNS security threats. Efforts within this group include the Domain Name Security Threat Information Collection and Reporting (DNSTICR). Data collected from the DAAR system is currently being used to generate monthly reports. In alignment with the CCT Recommendation 16, DAAR currently uses a documented set of reputation list providers to identify and track reported domain names associated with a specific set of security threats and abuse behavior across all generic and some country code top-level domain registries. ICANN org will continue to evaluate the security threat landscape and make adjustments to data analysis as the landscape changes. More information can be found in the CCT 16 Implementation Documentation.

- **CCT Recommendation 17** called for collecting, and publicizing, data regarding a chain of parties responsible for gTLD domain name registrations. As noted in the CCT 17 Implementation Documentation, reseller information is already displayed within the WHOIS, and this recommendation has been implemented to the extent possible within the current policy requirements.

- **CCT Recommendation 18** called for specific data to be gathered to inform the RDS-WHOIS2 review effort on data accuracy. ICANN org's Contractual Compliance provided the data. As a result, CCT Recommendation 18 was considered complete as articulated in the [CCT Recommendation 18 Implementation Documentation](#).

- **CCT Recommendation 30** recommended improving outreach to specific regions of the world as it relates to new gTLDs. In March 2023, Board approval of recommendations for the next round of the New gTLD Program superseded this recommendation that, as a consequence, will be addressed via the implementation of the Board-approved Subsequent Procedures Final Report outputs. Refer to [CCT Recommendation 30 Implementation Documentation](#) for more information.

- Similarly, **CCT Recommendation 31,** which prompted ICANN org to coordinate a pro-bono assistance program as it relates to gTLDs, was marked complete as it will be addressed by implementation of the next round of the New gTLD Program. Refer to [CCT Recommendation 31 Implementation Documentation](#) for more information.

There is a set of CCT components which are considered complete. Given the unique nature of the implementation of CCT where components of recommendations are divided into components and regrouped into relevant implementation efforts and incubators, the items listed here were not put forward for prioritization. The recommendation to which these components belong will be marked complete once all its items have been effectively addressed:

- **CCT Recommendation 21 items 1, 3, 4, 5, and 6** data points, namely on the class/type of abuse, the safeguard that is at risk, an indication of whether complaints relate to the protection of sensitive health or financial information, what type of contractual breach is being complained, were already available on ICANN Contractual Compliance's reporting [page](#) at the time of Board action on the CCT Final Report. The data point on resolution status of the complaints, including action details, was subsequently added in August 2019.

- In January 2018, ICANN Contractual Compliance started publishing information on the volume and nature of complaints received from gTLDs in highly regulated sectors and continues to do so on a monthly basis, thereby addressing **CCT Recommendations 23 items C (in part)**. This data can be found on the [monthly dashboard](#). Regarding the audit on registration practices, as recommended by **CCT Recommendation 23 item E**, ICANN Contractual Compliance conducts audits twice a year as per the existing Registry Agreement and Registrar Accreditation Agreement. The Board directed ICANN org to continue to monitor complaint trends in this area and to plan for an audit if any risk is identified.

- ICANN org currently reports on the data point identified in **CCT Recommendation 24 item A** ("complaints for a registry operator's failure to comply with either the safeguard related to gTLDs with inherently governmental functions or the safeguard related to cyberbullying") on a monthly basis.

Twelve recommendations out of the 35 recommendations are in progress:

- Categorized by the community group as P1, **CCT Recommendation 1** calls for formalizing and promoting ongoing data collection. ICANN org intends to develop a model to guide and support data-collection activities to inform future community work in an appropriate manner, and to contribute to effective policy development processes. Internal alignment is now being reached on the mission, vision, and

scope for the model including the organizational context and mandate, relevant stakeholder use cases, desired functions and services. Community feedback will be sought on the proposed model. The model is now expected to be in place in Q1 2024.

- **CCT Recommendation 6** requires collecting regional TLD-related data. ICANN org has previously presented a plan to partner with gTLD and ccTLD registration data providers to obtain the requested data. However, the plan notes that obtaining the ccTLD registration data may be difficult as ICANN does not hold agreements to this respect with ccTLD operators. Moreover, national laws could also affect ICANN's ability to obtain the data. To address this work, ICANN org is considering the development of a framework based on previous and similar marketplace studies that may inform the implementation of Recommendation 6. ICANN org will continue to explore potential sources of data to collect the information. The extent of analysis possible will depend on the overall availability of RDS data. CCT Recommendation 6 is currently scheduled to complete in Q2 2024 due to competing priorities, other ongoing work, and the overall complexity of implementation of this recommendation.

- **CCT Recommendation 7** recommends collecting data to understand the implication of parked domains. In Q3 2023, ICANN org put together a statement of work for external resources to collect the requested data. Plans to provide a definition of "parking" for community review and discussion are now scheduled for Q2 2024. Reaching alignment on this definition will be essential to deliver the appropriate data to the community. The estimated completion date for this work is now Q2 2024 due to competing priorities and other ongoing work.

- **CCT Recommendations 8 and 11** call for ICANN org to conduct periodic surveys of both registrants and end-users to better understand consumer choice and trust as it relates to new gTLDs. **CCT Recommendation 13 items 1, 2, and 4 (in part)** seek to obtain data about consumer awareness of registration restrictions and consumer trust levels in TLDs with restrictions compared to TLDs without restrictions. ICANN org is grouping these recommendations together to allow for a single survey. The combined survey approach reduces the cost of drafting and conducting registrant and end-user surveys, and alleviates the burden of having to collect and manage multiple datasets. Implementation of efforts requires close collaboration with the community to ensure buy-in and agreement on the approach and purpose of the survey and interpreting results. In Q3 2023, ICANN org began drafting a statement of work and the procurement process is ongoing. The recommendation is expected to complete in Q2 2024 due to competing priorities and other ongoing work.

- **CCT Recommendation 13 item 3** requires collecting information on the correlation between lower abuse rates and gTLDs that impose stricter registrations policies. In Q3 2023, ICANN org reached internal agreement on a process to collect the information. ICANN org expects the work on CCT Recommendation 13 item 3 to complete in Q3 2024 as it considers how ongoing studies and projects being conducted by the Office of the Chief Technology Office (OCTO) could tie in with this particular recommendation.

- ICANN org will conduct a voluntary pilot survey to gather the data requested by CCT **Recommendations 13 items 4 (in part) and 5** (costs and benefit of registration restrictions on contracted parties, including whether and how these are enforced or challenged); **CCT Recommendation 20** (whether tools to report and process complaints have helped fight DNS abuse); **CCT Recommendation 23 items A, C (in part), and D** (new gTLDs operating in highly regulated sectors); and **CCT**

Recommendation 24 item B (whether registries receive complaints related to cyberbullying and misrepresenting a governmental affiliation, and how they enforce safeguards). In Q3 2023, ICANN org continued its engagement with contracted parties on the intent and extent of the survey through consultation with the Registry and Registrar Stakeholder groups, and expects this engagement to continue through the course of Q4 2023. This consultation will inform the design of the survey, which ICANN org expects to launch in Q1 2024. Prior to that, in Q4 2023, the org will develop a questionnaire and test the survey before launching it. Once the survey is complete, results and participation rates in the survey will be reviewed to assess whether data brings valuable insights to ICANN org and the community, and should be run at regular intervals. The anticipated completion date for the set of recommendations is Q2 2024.

- **CCT Recommendation 21** proposes that ICANN Contractual Compliance collect and provide reports on the abuse reported to registry and registrars with a granularity that allows identification of origin, type, form, and nature of abuse or alleged illegal use of the DNS. While ICANN org already collects the data requested in CCT Recommendation 21 item 2 of the recommendation "the gTLD that is target of the abuse," ICANN org believes the Registries Stakeholder Group's input on the release of such data is essential. Work is in progress to prepare for this discussion. This work and therefore, CCT Recommendation 21 are now expected to complete in Q4 2023.

- **CCT Recommendation 22** requires engagement with stakeholders to discuss best practices implemented to offer appropriate security measures when dealing with sensitive information such as health or financial. ICANN org is combining this engagement work with the voluntary pilot survey of contracted parties (as described above) as this project requires working closely and together with external stakeholders to ensure buy-in and agreement on the approach and purpose of the engagement. This work is currently estimated for completion in Q2 2024.

- **CCT Recommendation 23 item B** calls for a review of a sample of websites within highly regulated sectors. ICANN org is currently determining a statement of work for external resources to assist in the collection of data relevant to Recommendation 23 B. ICANN org also plans to collect sample domain website data internally using the Centralized Zone Data Service (CZDS). At present, this portion of CCT Recommendation 23 is estimated for completion in Q1 2024 due to competing priorities and other ongoing work.

- **CCT Recommendation 26** recommends repeating a study at regular intervals to ascertain the impact of the New gTLD Program on the costs required to protect trademarks in the expanded Domain Name System. In Q3 2023, ICANN org launched a procurement process to conduct the study. The Board action noted an opportunity to collaborate with relevant partners to gain a deeper insight into the effects of the New gTLD Program on trademark enforcement, using a combination of qualitative and quantitative research. This recommendation is expected to complete in Q2 2024.

Second Registration Directory Service Review (RDS-WHOIS2)

Status of RDS-WHOIS2 Review

On 25 February 2020, the Board took action on each of the 22 recommendations, included in the RDS-WHOIS2 Final Report, as documented in an associated Scorecard, and approved 15 recommendations in whole or in part, subject to prioritization.

The RDS-WHOIS2 Review recommendations are built in part on the RDS-WHOIS2 Review Team's assessment of the implementation of the previous Directory Service Review recommendations.

Board Action on RDS-WHOIS2 – 22 Recommendations Q3-2023 Status	
Approve (in whole or in part) subject to prioritization	15 (Recommendations 1.1, 1.2, 1.3, 3.1, 3.2, 10.2, 11.2, 12.1, 15.1, LE.1, LE.2, SG.1, CC.1 [in part] CC.2, CC.3)
Pending Board consideration	4 (Recommendations 4.1, 4.2, 5.1, 10.1)
Pass through (in whole or in part)	2 (Recommendations CC.1 [in part], CC.4)
Reject	2 (Recommendations 11.1, BY.1)

Refer to Appendix F: Board-Approved RDS-WHOIS2 Recommendations for the full language of Board-approved recommendations, Appendix G: Passed-Through RDS-WHOIS2 Recommendations for more information on recommendations the Board passed through in whole or in part, Appendix H: RDS-WHOIS2 Recommendations Pending Board Consideration for recommendations the Board still needs to consider, and Appendix I: Rejected RDS-WHOIS2 Recommendations for details on, including rationale, recommendations the Board rejected.

Status of RDS-WHOIS2 Recommendations Pending Board Consideration

In Q3 2023, ICANN org took steps to begin an analysis of Recommendations 4.1, 4.2 and 5.1 that relate to data accuracy, and continued to refine its impact assessment of the outcomes of ongoing community work to inform Board consideration of RDS-WHOIS2 Recommendation 10.1, which aims to provide better data quality and contactability of the underlying contact owner for registrations using affiliated Privacy or Proxy services by requiring registrars to verify and validate the underlying registration data of domain name registrations.

Refer to Appendix H: RDS-WHOIS2 Recommendations Pending Board Consideration for the full language.

Prioritization of RDS-WHOIS2 Recommendations

As articulated in the table, a set of eight recommendation components was put forward for prioritization and prioritized in the FY23 Pilot Prioritization:

Board-Approved RDS-WHOIS2 Recommendations – 15 Recommendation Components Q3-2023 Prioritization Status		
Rec. / Rec. Component	**ICANN Org Proposed Prioritization[19]**	**Priority Assigned by Community Group in Pilot Prioritization**
1.3	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
3.1	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
11.2	P1 = *Highest Priority-Urgent/ Important*	P4 = *Lowest Priority-Less Urgent/Important*
15.1	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
LE.1	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
LE.2	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
SG.1	P2 = *Less Urgent/Important*	P2 = *Less Urgent/Important*
CC.1	P2 = *Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
Not Eligible for Prioritization Due to Dependencies		
Rec. / Rec. Component	**Rationale**	
3.2	The information or the messaging to be delivered by ICANN org to new target groups regarding the Registration Data Access Protocol (RDAP) phased implementation may be impacted by the implementation of the EPDP on the Temporary Specification for gTLD Registration Data. This work will begin as soon as the dependency on outcomes of the EPDP has been fully resolved.	
10.2	The ICANN Board deferred the third review of the Registration Directory Service (RDS3) in consideration of the dependency on the ongoing work related to the EPDP Phase 2 Final Report recommendations, including the proposed SSAD. This action was also to allow the ICANN community and organization sufficient time to plan for, and implement pertinent ATRT3 recommendations that have been prioritized for implementation.	
12.1	The ICANN Board deferred the RDS3 in consideration of the dependency on the ongoing work related to the EPDP Phase 2 Final Report recommendations, including the proposed SSAD. This action was also to allow the ICANN community and organization sufficient time to plan for, and implement pertinent ATRT3 recommendations that have been prioritized for implementation.	
CC.2	The improvements suggested by the recommendation will be addressed through implementation of EPDP Phase 1 – Registration Data Policy for gTLDs. The Public Comment period on the topic closed in Q4 2022. The publication of the policy was put on-hold due to a letter from the GAC to the ICANN Board requesting the ICANN Board to review the Urgent Request response time requirement in the policy.The Registrar Stakeholder Group subsequently wrote a letter to the ICANN Board and discussions are ongoing around next steps. ICANN org anticipates Recommendation CC.2 to complete once the Registration Data Policy is published	
N/A		
Rec. / Rec.	**Rationale**	

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[19] Proposed ranks were accompanied by a rationale. See the worksheet for more information.

Component	
1.1	Recommendation complete. See [implementation documentation](#).
1.2	Recommendation complete. See [implementation documentation](#).
CC.3	Recommendation complete. See [implementation documentation](#).

Refer to [Appendix F: Board-Approved RDS-WHOIS2 Recommendations](#) for recommendation language and to [Implementation Status of RDS-WHOIS2 Recommendations](#) for information on the status of the recommendations.

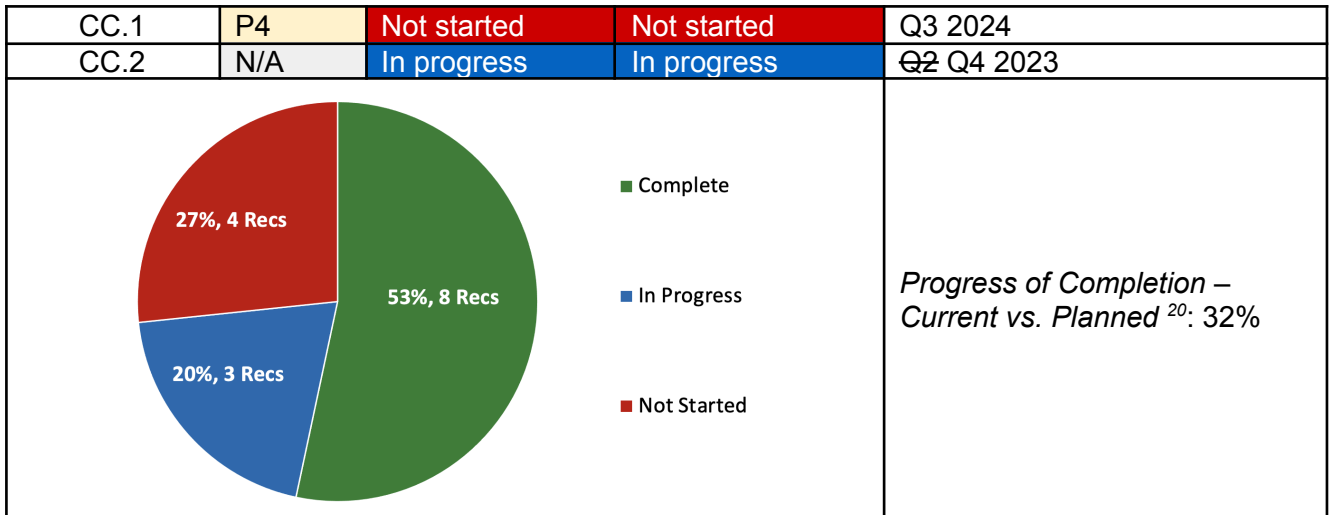## Implementation Status of RDS-WHOIS2 Recommendations

This section provides an update on Board-approved RDS-WHOIS2 Recommendations, including estimated implementation completion dates, where available, and links to implementation documentation produced by ICANN org.

The following table shows the status of the previous quarter against the last quarter. A strikethrough indicates a change to the tentative completion date.

"P. Label" in the table below corresponds to the prioritization label assigned by the community group. Any recommendation or recommendation component that was not included in the prioritization process for reasons articulated in the [Prioritization of RDS-WHOIS2 Recommendations](#) section is recorded as N/A in the "P. Label."

[Appendix F: Board-Approved RDS-WHOIS2 Recommendations](#) contains the full text of each recommendation.

Board-Approved RDS-WHOIS2 Recommendations – Recommendation Components Q3-2023 Status				
Rec. / Rec. Component	P. Label	Complete		Implementation Information
1.1	N/A	Completed in N/A		[Implementation Documentation](#)
1.2	N/A	Completed in N/A		[Implementation Documentation](#)
1.3	P4	Completed in N/A		[Implementation Documentation](#)
11.2	P4	Completed in N/A		[Implementation Documentation](#)
15.1	P4	Completed in Q4 2022		[Implementation Documentation](#)
LE.1	P4	Completed in N/A		[Implementation Documentation](#)
LE.2	P4	Completed in N/A		[Implementation Documentation](#)
CC.3	N/A	Completed in N/A		[Implementation Documentation](#)
Rec. / Rec. Component	P. Label	Q2 2023 Implementation Status	Q3 2023 Implementation Status	Implementation Information/ Estimated Completion Date
3.1	P4	In progress	In progress	~~Q4 2023~~ Q1 2024
3.2	N/A	Not started	Not started	Dependency – see below for more information.
10.2	N/A	Not started	Not started	Dependency – see below for more information.
12.1	N/A	Not started	Not started	Dependency – see below for more information.
SG.1	P2	In progress	In progress	Q4 2023

CC.1	P4	Not started	Not started	Q3 2024
CC.2	N/A	In progress	In progress	~~Q2~~ Q4 2023

*Progress of Completion – Current vs. Planned [20]: 32%*

The overall implementation progress of Board Approved RDS-WHOIS2 Recommendations (June 2023) is summarized in the graph[21] below.
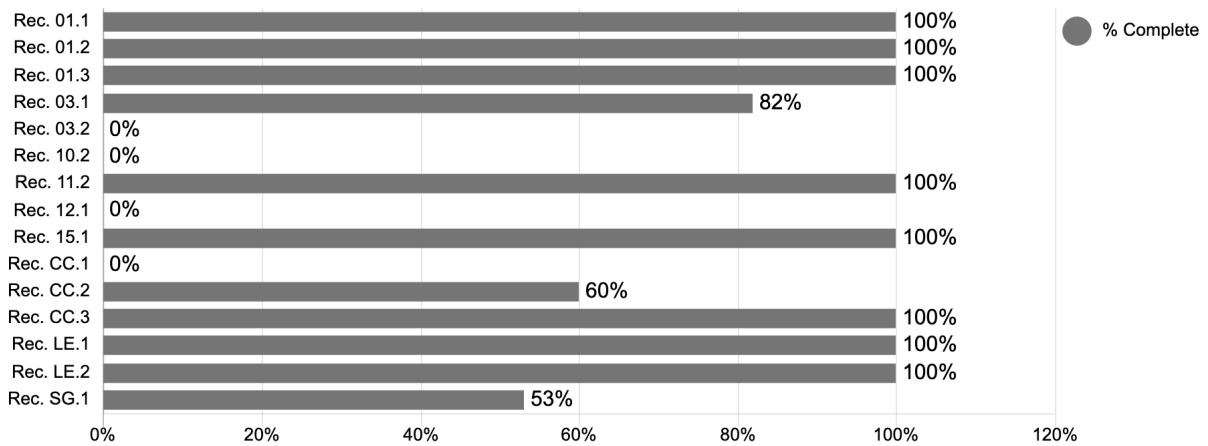
Since the FY23 prioritization concluded, progress of implementation status over past quarters in calendar year 2022 and in 2023 is as follows:

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[20] The progress of completion current vs. planned is an indicator that is measuring "on-time delivery" by indicating whether the work is progressing according to the time frame set when the work plan was developed. This indicator is impacted by progress of the work as well as by changes to the work plan. The indicator shows negative if less work has been completed than originally time-planned. The indicator shows positive if the work completed is ahead of the original plan/schedule.

[21] This chart is not indicative of the difference in level of effort for each recommendation.
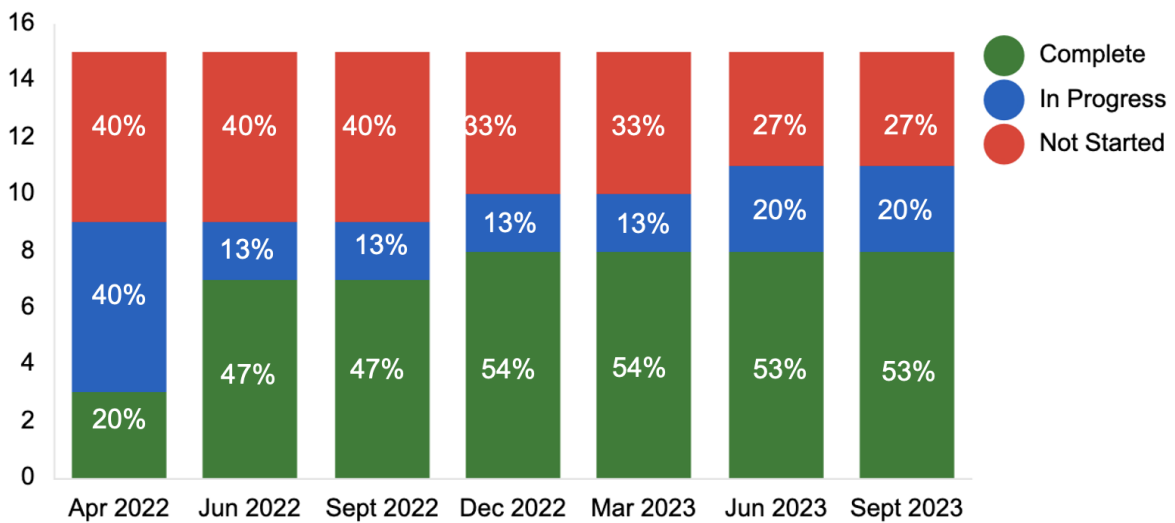
Implementation Status of Board-Approved RDS-WHOIS2 Recommendations (September 2023)

Status of Board-Approved RDS-WHOIS2 Recommendations Q3 2023 Status	May 22	Jun 22	Sept 22	Dec 22	Mar 23	Jun 23	Sept 23
Complete	3	7	7	8	8	8	8
In Progress	6	2	2	2	2	3	3
Not Started	6	6	6	5	5	4	4

Eight of the 15 RDS-WHOIS2 recommendations are complete as described in their respective implementation documentation:

- **RDS-WHOIS2 Recommendations 1.1 and 1.2** called for a forward-looking mechanism that monitors legislative and policy developments. In its action on the Final Report, the Board noted that ICANN org's existing initiative already addresses the concerns, thereby concurring with a clarification provided by the RDS-WHOIS2 Implementation Shepherds. Given their complete status, the recommendations were not put forward for prioritization. ICANN org has produced RDS-WHOIS2 1.1-1.2 Implementation Documentation to report on how the recommendations' intent has been addressed.

- In establishing the implementation design for **RDS-WHOIS2 Recommendation 1.3** (prioritized as P4), ICANN org noted that the requirement of demonstrating that Board activities on RDS are taking place, as clarified by RDS-WHOIS implementation shepherds, is already being addressed. As detailed in the RDS-WHOIS 1.3 Implementation Documentation, since the time Recommendation 1.3 was issued, the ICANN Board has sustained a significant amount of work dedicated to RDS issues, and the Board's focus on this work remains visible to the ICANN community.

- **RDS-WHOIS2 Recommendation 11.2** related to common interface display of information and updates. In refining implementation design for the recommendation

prioritized as P4, the cross-functional project team came to the determination that the RDAP lookup tool, including its designed ability to address any future policy or contractual changes, as well as the gTLD RDAP profile that was developed with registrars and registries, address requirements of the recommendation. The RDS-WHOIS2 11.2 Implementation Documentation includes the appropriate information.

- **RDS-WHOIS2 Recommendation 15.1** called for improvements to ICANN org's project management and implementation reports. The creation of the Implementation Operations department, as well as the improved project management culture and training provided to org members, have contributed toward improving the way non-policy recommendations are being addressed by org. The Implementation Operations department deployed an approach that includes clarity around status of implementation, enhanced templates to assist with implementation design, and a more frequent and detailed reporting mechanism. Prioritized by the community group as P4, Recommendation 15.1 was marked complete when ICANN org's Implementation Operations department produced the first quarterly report on Specific Reviews. More details can be found in the RDS-WHOIS2 15.1 Implementation Documentation.

- **RDS-WHOIS2 Recommendations LE.1 and LE.2** identified a need for data-gathering to inform whether RDS is effective in meeting law enforcement needs. When assessing the existing initiatives during implementation design, i.e. the study conducted to inform EPDP Phase 2 work along with questionnaires and outreach conducted to inform work on SSAD ODA, it was determined that both recommendations were implemented to the extent possible, as detailed in the RDS-WHOIS2 LE.1-LE.2 Implementation Documentation. The cadence of the data collection will be addressed through the data collection model recommendation in CCT Recommendation 1.

- **RDS-WHOIS2 Recommendation CC.3** called for adequate resources for ICANN Contractual Compliance. In its action on the Final Report, the Board noted that the recommendation was already part of ICANN org's existing budgeting and planning process. Given its complete status, the recommendation was not put forward for prioritization. ICANN org produced RDS-WHOIS2 CC.3 Implementation Documentation to report on how the recommendation's intent is addressed.

Three of the 15 RDS-WHOIS2 recommendations are in progress:

- Categorized by the community group as P4, **RDS-WHOIS2 Recommendation 3.1** articulates the need for improvements to web information and educational materials on RDS. Several milestones have already been reached to address this recommendation as ICANN org updated the content and navigation of the registration data look up tool. The information on that page has been reorganized and now appears on the Domain Name Registration Data Policies and Related Requirements page, which contains information regarding existing policies and requirements as well as ongoing policy development work. Moreover, ICANN org's Contractual Compliance has included the links to this information on the Complaint Submission page.

  The RDS-WHOIS2 Recommendation 3.1 further requires the involvement of users (potentially focus groups) to ensure requirements are met. ICANN org plans to meet this element of the recommendation through engagement with community members,

potentially through focus groups and surveys. The success of this implementation is dependent upon community participation. ICANN org concluded its engagement plan in Q3 2023, and plans to now deploy it in Q4 2023 with the goal of analyzing results and addressing Recommendation 3.1 in full by the end of Q4 2023.

- Prioritized by the community group as P2, **RDS-WHOIS2 Recommendation SG.1** recommends ICANN's contracts with contracted parties to include uniform and strong requirements for the protection of registrant data. The Board directed ICANN org to include this element in a contract negotiation. In Q3 2023, ICANN concluded its gap analysis between existing contracts and policy requirements versus the desired outcomes and is now defining next steps in light of the gap analysis findings.

- **RDS-WHOIS2 Recommendation CC.2** requires that all gTLD domain name registration directory entries contain at least one full set of either registrant or administrative contact details. Recognizing that this requirement is fulfilled by the Registration Data Policy for gTLDs, which addresses the collection, transfer, and publication of gTLD registration data, the recommendation was not put forward for prioritization. The improvements suggested by the recommendation will be addressed through implementation of EPDP Phase 1 – Registration Data Policy for gTLDs. The [Public Comment period](#) on the topic closed in Q4 2022. The publication of the policy was put on-hold due to a [letter](#) from the GAC to the ICANN Board requesting the ICANN Board to review the Urgent Request response time requirement in the policy.The Registrar Stakeholder Group subsequently wrote a [letter](#) to the ICANN Board and discussions are ongoing around next steps. ICANN org anticipates Recommendation CC.2 to complete once the Registration Data Policy is published.

Four of the 15 RDS-WHOIS2 Recommendations are in "not started" status, three of which are tied to dependencies:

- **RDS-WHOIS2 Recommendation 3.2** calls for RDS-related outreach conducted outside of groups with which ICANN org usually engages. As the EPDP and the RDAP phased implementation could impact the information or the messaging to be delivered by ICANN org to new target groups, this recommendation was not included in the prioritization cycles. Given the changing RDS landscape, it is essential that any awareness campaign reflects the most up-to-date and relevant information. As a result, work on addressing RDS-WHOIS2 Recommendation 3.2 will begin as soon as the dependency on outcomes of the EPDP has been fully resolved.

- **RDS-WHOIS2 Recommendations 10.2 and 12.1** call for specific areas of work to be addressed by the subsequent review team (RDS3). As the Board had approved ATRT3 recommendation to suspend any further RDS Reviews pending the outcome of the next ATRT, subject to prioritization and community agreement to the related Bylaws changes, Recommendations 10.2 and 12.1 were not included in the prioritization. As reported in [Implementation Status of Board-Approved ATRT3 Recommendations](#), in September 2022 the ICANN Board [deferred](#) the third RDS Review to allow the community and ICANN org sufficient time to plan for and implement pertinent ATRT3 recommendations that were prioritized for implementation. Recognizing the Bylaws requirement that the RDS Review should be conducted every five years, the Board suspended RDS3 until the next ATRT can make a determination on future RDS reviews, as recommended in ATRT3 Recommendation 3.1. The Board will oversee the implementation of ATRT3 recommendations and determine whether the timing of the RDS3 should be

re-examined based on the changing environment, including various dependencies such as the ongoing work related to the EPDP Phase 2 Final Report recommendations, including SSAD. As a result, Recommendations 10.2 and 12.1 cannot be prioritized or implemented, at this time.

One recommendation is scheduled for implementation:

- Categorized as a P4 recommendation by the community group, **RDS-WHOIS2 Recommendation CC.1** calls for the Board to act on gTLD domain names suspended due to incorrect RDS contact data. Similar to RDS-WHOIS2 Recommendation SG.1, the Board directed ICANN org to include this element in the next round of contract negotiations. ICANN org believes it would be beneficial to better understand current industry practices in this regard as well as discuss the approach with registrars as noted in the recommendation. Tentatively, a summary of the implementation approaches taken by registrars will be put together in Q1 2024 for enabling discussions, and alignment, with registrars in Q2 2024. Subsequently, tentatively in Q3 2024, ICANN org will determine whether changes to the contract are necessary, and if so, whether any technical development would be required. Potential revisions to contracts with contracted parties need to be weighed with other activities related to updating agreements, such as revisions stemming from the Subsequent Procedures Final Report Recommendations.

Second Security, Stability, and Resiliency Review (SSR2)

Status of SSR2 Review

On 22 July 2021, the Board took action on each of the recommendations included in the SSR2 Final Report, as documented in the July 2021 Scorecard. The Board action included the approval of 13 recommendations subject to prioritization.

Informed by further clarification received from the SSR2 Implementation Shepherds and ICANN org assessment, the Board subsequently:

- Took action on 1 May 2022 to approve one recommendation subject to prioritization, and reject two recommendations, as articulated in the May 2022 Scorecard.
- Took action on 16 November 2022 to approve 9 recommendations and reject 12, as noted in the November 2022 Scorecard.
- Took action on 10 September 2023 to approve one recommendation and reject eight, as documented in the associated scorecard.

The SSR2 recommendations cover the following areas:

- The extent to which prior SSR Review recommendations have been implemented and whether implementation has resulted in the intended effect.
- SSR within ICANN.
- DNS abuse from a contractual, compliance, and transparency perspective.
- Additional SSR-related concerns regarding the global DNS.

Board Action on SSR2 – 63 Recommendations Q3-2023 Status	
Approve subject to prioritization	14 (Recommendations 1.1, 5.1, 5.2, 5.3, 5.4, 7.5, 10.1, 16.1, 21.1, 22.1, 22.2, 23.1, 23.2, 24.2)
Approve as fully implemented	10 (Recommendations 3.2, 3.3, 4.1, 7.1, 7.2, 7.3, 9.1, 11.1, 13.2, 24.1)
Pending Board consideration, likely to be approved once further information is gathered to enable approval	/
Pending, holding to seek clarity or further information	1 (Recommendation 17.1)
Pending, likely to be rejected unless additional information shows implementation is feasible	/
Reject because the recommendations cannot be approved in full	8 (Recommendations 4.2, 8.1, 9.4, 10.2, 10.3, 17.2, 20.1, 20.2)

Reject	30 (Recommendations 2.1, 2.2, 2.3, 2.4, 3.1, 4.3, 6.1, 6.2, 7.4, 9.2, 9.3, 12.1, 12.2, 12.3, 12.4, 13.1, 14.2, 14.1, 14.3, 14.4, 14.5, 15.1, 15.2, 16.2, 16.3, 18.1, 18.2, 18.3, 19.1, 19.2)

Refer to Appendix J: Board-Approved SSR2 Recommendations for the full language of Board-approved recommendations, Appendix K: SSR2 Recommendation Pending Board Consideration for recommendations the Board still needs to consider, and Appendix L: Rejected SSR2 Recommendations for details on, including rationale, recommendations the Board rejected.

Status of SSR2 Recommendations Pending Board Consideration

There is one remaining SSR2 recommendation pending Board consideration:
- Recommendation 17.1, which relates to a framework to characterize the nature and frequency of name collisions and resulting concerns, has dependencies on the Security and Stability Advisory Committee (SSAC)'s studies on name collisions, specifically the Name Collision Analysis Project (NCAP) work. This recommendation will be evaluated after the NCAP Study 2 report is released. The outcome of these reports will help inform staff of the feasibility and potential implementation of this recommendation.

Refer to Appendix K: SSR2 Recommendation Pending Board Consideration for the full language.

Prioritization of SSR2 Recommendations

A set of nine recommendation components was put forward for prioritization and prioritized in the FY23 Pilot Prioritization. Subsequently, one recommendation approved by the Board in May 2022 was confirmed by ICANN org as eligible for prioritization and was included in the FY24 Operating Plan and Budget cycle. Furthermore, two additional recommendations, approved by the Board in November 2022, were included in the FY25 prioritization cycle that took place in Q2 2023.

Board Approved SSR2 Recommendations – Recommendation Components Q3-2023 Status		
Rec. / Rec. Component	ICANN Org Proposed Prioritization[22]	Priority Assigned by Community Group[23]
1.1	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
5.3	P4 = *Lowest Priority-Less Urgent/Important*	P2 = *Less Urgent/Important*
5.4	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
7.5	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*

[22] Proposed ranks were accompanied by a rationale. See this worksheet for more information on 1.1, 10.1, 16.1, 21.1, 22.1, 22.2, 23.1, 23.2, and 24.2, and this worksheet for information on 5.4.
[23] See this list for priority assigned by the community group 1.1, 10.1, 16.1, 21.1, 22.1, 22.2, 23.1, 23.2, and 24.2, and this list for priority assigned on 5.4.

10.1	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
16.1	*P3 = Urgent/Less Important*	*P3 = Urgent/Less Important*
21.1	P1 = *Highest Priority-Urgent/ Important*	P1 = *Highest Priority-Urgent/ Important*
22.1	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
22.2	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*
23.1	*P3 = Urgent/Less Important*	*P3 = Urgent/Less Important*
23.2	P2 = *Less Urgent/Important*	P1 = *Highest Priority-Urgent/ Important*
24.2	P4 = *Lowest Priority-Less Urgent/Important*	P4 = *Lowest Priority-Less Urgent/Important*

Not Eligible for Prioritization	
Rec. / Rec. Component	**Rationale**
3.2	Recommendation complete. See implementation documentation.
3.3	Recommendation complete. See implementation documentation.
4.1	Recommendation complete. See implementation documentation.
5.1	There is a dependency on the migration to the U.S. Department of Commerce National Institute of Standards and Technology (NIST) Cybersecurity Framework. Recommendation 5.1, once migration to the NIST Cybersecurity Framework is fully complete, will be considered implemented, as noted in the Board action on the SSR2 Final Report.
5.2	There is a dependency on the migration to the NIST Cybersecurity Framework. Recommendation 5.2, once migration to the NIST Cybersecurity Framework is fully complete, will be considered implemented, as noted in the Board action on the SSR2 Final Report.
7.1	Recommendation complete. Implementation documentation in progress.
7.2	Recommendation complete. Implementation documentation in progress.
7.3	Recommendation complete. Implementation documentation in progress.
9.1	Recommendation complete. See implementation documentation.
11.1	Recommendation complete. See implementation documentation.
24.1	Recommendation complete. See implementation documentation.

Refer to Appendix J: Board-Approved SSR2 Recommendations for recommendation language and to Implementation Status of SSR2 Recommendations for information on the status of the recommendations.

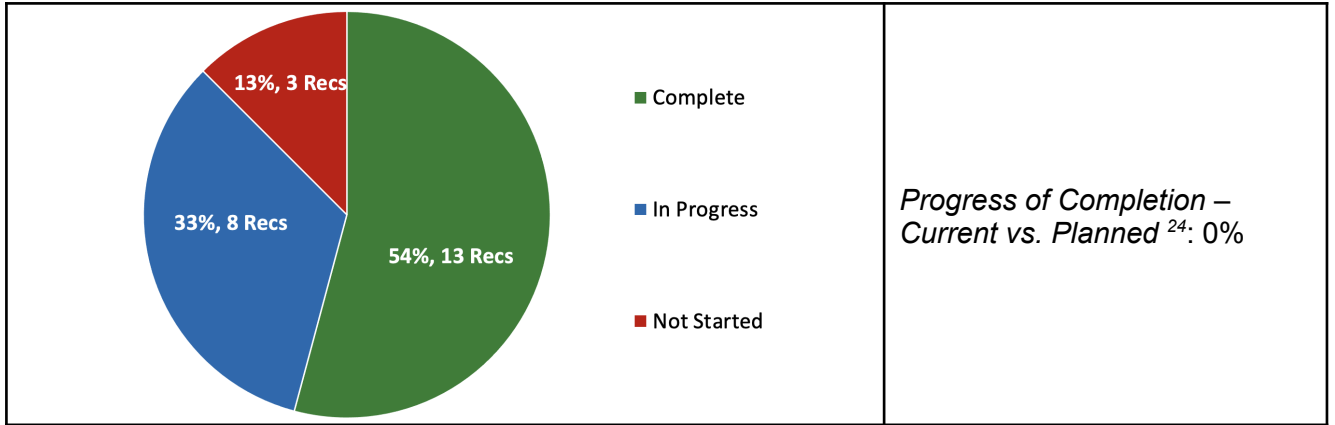## Implementation Status of SSR2 Recommendations

This section provides an update on Board-approved SSR2 Recommendations, including estimated implementation completion dates, where available, and links to implementation documentation produced by ICANN org.

The following table shows the status of the previous quarter against the last quarter. A strikethrough indicates a change to the tentative completion date.
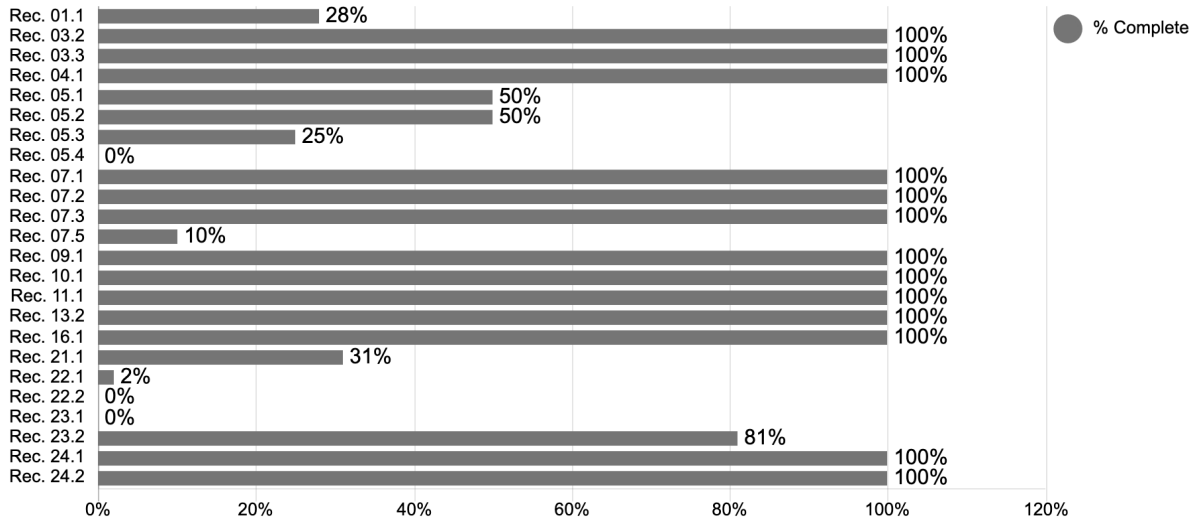
"P. Label" in the table below corresponds to the prioritization label assigned by the community group. Any recommendation or recommendation component that was not included in the prioritization process for reasons articulated in the Prioritization of Board-Approved SSR2 Recommendations section is recorded as N/A in the "P. Label."

Appendix J: Board-Approved SSR2 Recommendations contains the full text of each recommendation.

Board-Approved SSR2 Recommendations – Recommendation Components Q3-2023 Status				
Rec. / Rec. Component	**P. Label**	**Complete**		**Implementation Information**
3.2	N/A	Completed in N/A		Implementation documentation
3.3	N/A	Completed in N/A		Implementation documentation
4.1	N/A	Completed in N/A		Implementation Documentation
7.1	N/A	Completed in N/A		Implementation documentation in progress.
7.2	N/A	Completed in N/A		Implementation documentation in progress.
7.3	N/A	Completed in N/A		Implementation documentation in progress.
9.1	N/A	Completed in N/A		Implementation Documentation
10.1	P1	Completed in Q2 2023		Implementation Documentation
11.1	N/A	Completed in N/A		Implementation documentation
13.2	N/A	Completed in N/A		Implementation Documentation
16.1	P3	Completed in Q1 2023		Implementation Documentation
24.1	N/A	Completed in N/A		Implementation documentation
24.2	P4	Completed in Q4 2023		Implementation Documentation
Rec. / Rec. Component #	**P. Label**	**Q2 2023 Implementation Status**	**Q3 2023 Implementation Status**	**Implementation Information/ Estimated Completion Date**
1.1	P4	In progress	In progress	~~Q2 2023~~ Q1 2024
5.1	N/A	Not started	In progress	Dependency – see below for more information.
5.2	N/A	Not started	In progress	Dependency – see below for more information.
5.3	P2	Not started	In progress	Q4 2023
5.4	P4	Not started	Not started	Implementation design in progress.
7.5	P4	In progress	In progress	Implementation design in progress.
21.1	P1	In progress	In progress	Q1 2024
22.1	P4	In progress	In progress	~~Q1~~ Q4 2023
22.2	P4	Not started	Not started	Q4 2023
23.1	P3	Not started	Not started	Q4 2024
23.2	P1	In progress	In progress	~~Q2~~ Q4 2023

Progress of Completion – Current vs. Planned [24]: 0%

Legend:
- Complete
- In Progress
- Not Started

Pie chart values: 13%, 3 Recs (Not Started); 33%, 8 Recs (In Progress); 54%, 13 Recs (Complete)

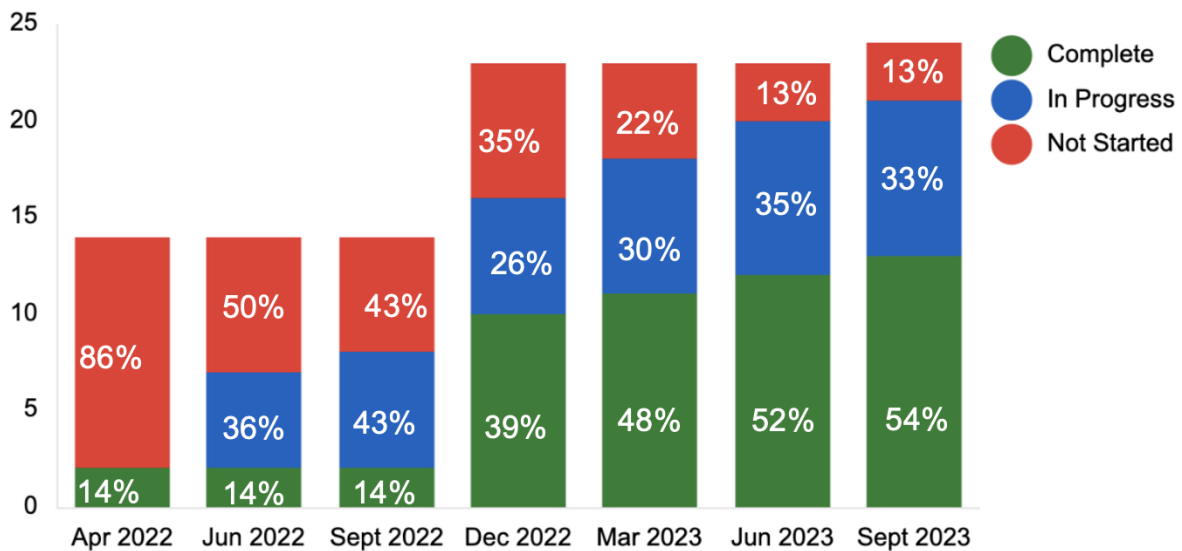The overall implementation progress of Board Approved SSR2 Recommendations (June 2023) is summarized in the graph[25] below.

Bar chart — % Complete:
- Rec. 01.1: 28%
- Rec. 03.2: 100%
- Rec. 03.3: 100%
- Rec. 04.1: 100%
- Rec. 05.1: 50%
- Rec. 05.2: 50%
- Rec. 05.3: 25%
- Rec. 05.4: 0%
- Rec. 07.1: 100%
- Rec. 07.2: 100%
- Rec. 07.3: 100%
- Rec. 07.5: 10%
- Rec. 09.1: 100%
- Rec. 10.1: 100%
- Rec. 11.1: 100%
- Rec. 13.2: 100%
- Rec. 16.1: 100%
- Rec. 21.1: 31%
- Rec. 22.1: 2%
- Rec. 22.2: 0%
- Rec. 23.1: 0%
- Rec. 23.2: 81%
- Rec. 24.1: 100%
- Rec. 24.2: 100%

Since the FY23 prioritization concluded, progress of implementation status over past quarters in calendar year 2022 and in 2023 is as follows:

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[24] The progress of completion current vs. planned is an indicator that is measuring "on-time delivery" by indicating whether the work is progressing according to the time frame set when the work plan was developed. This indicator is impacted by progress of the work as well as by changes to the work plan. The indicator shows negative if less work has been completed than originally time-planned. The indicator shows positive if the work completed is ahead of the original plan/schedule.

[25] This chart is not indicative of the difference in level of effort for each recommendation.

Implementation Status of Board-Approved SSR2 Recommendations (September 2023)

Status of Board-Approved SSR2 Recommendations Q3 2023 Status	May 22	Jun 22	Sept 22	Dec 22	Mar 23	Jun 23	Sept 23
Complete	2	2	2	9	11	12	13
In Progress	0	5	6	6	7	8	8
Not Started	12	7	6	8	5	3	3

Thirteen of the 24 (Status of SSR2 Review for more information) SSR2 recommendations are complete:

- **SSR2 Recommendation 3.2** suggested that budget items related to the performance of SSR functions be linked to ICANN Strategic Plan goals and objectives, while **SSR2 Recommendation 3.3** called for transparency and opportunity to comment on SSR budgeting. Recognizing the existing transparency and Public Comment framework around the organization's planning and budgeting cycle (more specifically, ICANN org's Operating and Financial Plans for FY 22–26 (Five-Year) and FY22 (One-Year) includes "Appendix C: ICANN Security, Stability, and Resiliency (SSR) of the Unique Internet Identifiers" and extensive public consultation activities are in place with regard to the Five-Year Operating and Financial Plan and Annual Operating Plan and Budget, and the Five-Year Strategic Plan), the Board-approved Recommendations 3.2 and 3.3 as fully implemented. Periodic communication on SSR activities is part of the ongoing operations and will be continuously enhanced, as directed by the Board. See SSR2 3.2 Implementation Documentation and SSR2 3.3 Implementation Documentation for more information.

- **SSR2 Recommendation 4.1** called for centralizing risk management and for the Security Risk Management Framework to be articulated and mapped to the org's objectives. In its action on the Final Report, the Board-approved the recommendation as already fully implemented, and called for no further action. The Board noted that

ICANN org already has policies, plans and programs in place. Given its complete status, SSR2 Recommendation 4.1 was not put forward for prioritization. ICANN org has produced SSR2 4.1 Implementation Documentation to report on how the recommendation is addressed.

- The set of **SSR2 Recommendations 7.1, 7.2, and 7.3** related to Business Continuity (BC) and Disaster Recovery (DR) plans. In its action the Board noted that ICANN org follows the Contingency Planning Guide for Federal Information Systems (NIST SP 800-34 Rev 1) which is a more integrated approach with, and given, ICANN org's remit. The recommendations, as such, were approved by the Board as fully implemented. Implementation documentation for SSR2 Recommendations 7.1, 7.2, and 7.3 will be released in Q4 2023.

- **SSR2 Recommendation 9.1** recommended monitoring, and enforcing, compliance of contracted parties to abuse-related obligations in agreements, contracts and policies. As this recommendation's success measures are in alignment with Contractual Compliance's existing work, SSR2 Recommendation 9.1 was approved by the Board as fully implemented. More information can be found in the SSR2 9.1 Implementation Documentation.

- **SSR2 Recommendation 10.1** was categorized as P1 by the community group and called for increased transparency around the working definition of DNS abuse/security threats that ICANN org uses, including links to excerpts of abuse-related obligations and related procedures, in contracts with contracted parties. SSR2 Recommendation 10.1 Implementation Documentation contains more information. DNS abuse/security are concepts in permanent evolution. ICANN org will continue to monitor the DNS threat landscape and update the terminology used in the webpage. The topic of DNS abuse has the attention of nearly all of the Supporting Organizations and Advisory Committees within the gTLD space and is the subject of ongoing community discussion.

- **SSR2 Recommendation 11.1** pertained to the access to Centralized Zone Data Service (CZDS) data. The Board determined in its action that the ongoing and completed work to date, conducted to address SAC097: SSAC Advisory Regarding the CZDS and Registry Operator Monthly Activity Reports, meets the requirements of Recommendation 11.1. Refer to SSR2 11.1 Implementation Documentation for full reference.

- **SSR2 Recommendation 13.2** called for ICANN org to publish the number of complaints made in a form that allows independent third parties to analyze the data. In its action the Board noted that the existing publication format of data and metrics on ICANN.org fulfills the intent of the recommendation. The recommendation was approved as fully implemented. Read SSR2 13.2 Implementation Documentation for more information.

- **SSR2 Recommendation 16.1**, prioritized as P3, required consistent cross-referencing on ICANN org to streamline information and improve access to all action taken on privacy and data stewardship. ICANN org conducted a diligent review of the icann.org pages to identify updates needed and aligned internally on web updates. This process was also conducted for RDS and data protection/privacy webpages. ICANN org completed this recommendation in early January 2023. More information can be found in the SSR2 16.1 Implementation Documentation.

- **SSR2 Recommendation 24.1** suggested performing end-to-end testing of the full Emergency Back-End Registry Operator (EBERO) and to publish the results. As noted in ICANN org agreements with the EBERO service providers, there is a provision which allows for EBERO readiness exercises to be conducted annually. This recommendation, as such, was approved by the Board as fully implemented. Read the SSR2 24.1 Implementation Documentation for full reference.

- Listed as a P4 recommendation by the community group, **SSR2 Recommendation 24.2** called for a link to the Common Transition Process Manual to be added to the EBERO webpage on icann.org. On 21 December 2022, ICANN org published a link to the Common Transition Process Manual to ICANN org's EBERO webpage. A link to a PDF copy of the Common Transition Process Manual can be found in the "Additional Agreement Information" section of the webpage. Read the SSR2 24.2 Implementation Documentation for more information.

Eight of the 24 SSR2 recommendations are in progress:

- Categorized as P4 during the FY23 prioritization, **SSR2 Recommendation 1.1** calls for reviewing SSR1 implementation and executing a new plan of action. ICANN org has conducted an assessment of the implementation of SSR1 recommendations and verified status of SSR1 recommendations to determine the appropriate status (complete, incomplete, partially complete, or superseded). During Q3 2023, work continued to engage subject matter experts on re-labeling the implementation status of SSR1 recommendation with accompanying rationale, and in identifying new actions, as required. ICANN org foresees the conclusions of these activities in Q1 2024 with the publication of a report. Any action resulting from this work will be subject to prioritization, as noted in the ICANN Board action.

- **SSR2 Recommendations 5.1 and 5.2** pertain to information security management systems and security certifications. In its action on the SSR2 Final Report, the Board noted that ICANN org is currently following industry-specific security standards and best practices and is in the process of migrating to the U.S. Department of Commerce National Institute of Standards and Technology (NIST) Cybersecurity Framework, with oversight from the Board Risk Committee. The Board action indicates that once migration to the NIST Cybersecurity Framework is fully completed, Recommendations 5.1 and 5.2 will be considered implemented. As a result, no prioritization will be required for 5.1 and 5.2. In Q3 2023 work continued to complete the migration towards NIST.

- **SSR2 Recommendation 5.3**, which the Board approved in November 2022 subject to prioritization, requires external parties to be compliant with relevant security standards. For all E&IT selected services, ICANN org performs a Risk Analysis which includes the vendor's use of standardized security frameworks. For all other services, ICANN org is working to include text in new contracts with vendors, as well as in contract renewals, to address this recommendation. This recommendation is now expected to complete in Q4 2023.

- **SSR2 Recommendation 7.5** requests the publication of a summary of the Business Continuity (BC) and Disaster Recovery (DR) plans and procedures, and calls for an external audit to verify compliance with plans. Work has started on drafting a summary of the established Contingency and Continuity Plan and the DR plan which cover all ICANN systems and are tested annually by ICANN org's E&IT function.

- **SSR2 Recommendation 21.1**, prioritized as P1, requires to move implementation of new Root Zone Management System (RZMS) security measures forward as it relates to the authentication and authorization of requested changes so as to allow TLD operators the opportunity to use those measures, in particular the Multi-Factor Authentication (MFA) and encrypted email.

  The recommendation will be met via the implementation of MFA using Time-Based One-Time Password (TOTP), a technique standardized in the Internet Engineering Task Force. While the initial implementation will focus on TOTP, the system will be architected to allow for alternative authentication mechanisms in the future. The recommendation to implement encrypted email is understood to be driven by the current practice of transmitting sensitive authentication information via email. ICANN org understands that the Internet Assigned Numbers Authority (IANA) has already decided to end this practice in the next generation RZMS, and therefore, believes encrypted email is no longer essential to mitigate the security concern. Email notifications will be limited to notifying customers of pending tasks in the system. They will be required to login to obtain and review sensitive information, with no authentication tokens transmitted in the email. As encrypted email poses significant implementation challenges and extensive customer education, IANA does not plan to implement this aspect of the recommendation at this time in light of the alternative remediation of the security concern.

  ICANN has begun development for TOTP and made the decision to include Account Recovery Codes and Token-based API Authentication in the scope. Development of these additional features began in Q3 2023. This quarter ICANN also secured a contractor to assist with defining the business requirements for the Know your Customer feature, drafted a communications plan, and began identifying training materials, procedures and other documentation that would be required prior to launch of MFA.

  Upon further assessment, ICANN decided to align the timing of the MFA launch to the Know Your Customer requirements deliverable to strengthen the overall security of MFA-enabled accounts. The vendor is to evaluate IANA's current operational procedures against best practices and determine if further development work would be needed. SSR2 Recommendation 21.1 is still estimated to complete in Q1 2024 provided significant engineering changes are not required.

- **SSR2 Recommendation 22.1** recommends putting together and publishing a list of statistics and metrics that reflect the operational status of services (root zone, gTLD, IANA registries). This recommendation was prioritized as P4 and moved to in progress as there is data collected on key systems and services. ICANN org currently plans to create a new webpage in context of the Information Transparency Initiative to feature this information.

- Listed by the community group as a P1 in FY23, **SSR2 Recommendation 23.2** recommends developing a consensus plan for future root DNSKEY algorithm rollovers, working with root zone partners and using lessons learned from the 2018 rollover. ICANN understands IANA plans to implement a similar approach to the 2018 root zone key signing key rollover, namely the convening of a community effort to develop recommendations that will inform the parameters associated with root zone algorithm rollovers. A subsequent project would execute algorithm rollovers consistent with the recommendations produced by this activity. A vendor was selected to facilitate the development of the requirements in Q3 2022.

The call for community volunteers for the design team received 28 applications, and the design team was formalized in Q1 2023.

The design team and ICANN staff experts determined that the scope of work would be larger than originally planned. For this reason it was estimated that the consensus plan for future Root DNSKEY Algorithm Rollover would be published in Q4 2023. While in Q2 2023, the project team was on track to have the draft document out for public comment still within the same quarter, it was determined that additional rounds of review were needed. As a result, Public Comment is now scheduled to launch in mid-October 2023 and close in early December 2023. It is estimated that SSR2 Recommendation 23.2 will be completed in Q1 2024. However, additional work may be required, based on public comments received and evaluated.

Three of the 23 SSR2 recommendations are in "not started" status, two of which depend on the completion of another:

- In Q3 2023, the cross-functional project team continued its implementation design for **SSR2 Recommendation 5.4**, to which the community group assigned a P4 level in FY24 prioritization. The recommendation calls for clear reporting of what ICANN org is doing and achieving in the security space.

- Listed as a P4 by the community group, **SSR2 Recommendation 22.2** is in continuation of SSR2 Recommendation 22.1, as described above, and requires collecting community feedback on measurements on an annual basis, and publicly summarizing it. To implement this, ICANN org currently plans to generate an email address linked to a ticketing system that will allow the community to provide feedback and suggestions on a continuous basis. The annual report will include data that shows frequency and content of feedback provided through this mechanism (if any).

- **SSR2 Recommendation 23.1**, a P3 recommendation, calls for PTI operations to update the DNSSEC Practice Statement (DPS) to allow the transition from one digital signature algorithm to another. SSR2 Recommendation 23.2, as noted in the Board action on the SSR2 Final Report, must be completed before the DNSSEC Practice Statement can be updated. Updating the DPS is standard practice anytime there is modification to any standard operating procedures involving DNSSEC. Recognizing the dependency on SSR2 Recommendation 23.2, SSR2 Recommendation 23.1 is expected to be completed in Q4 2024.

Appendix A: Board-Approved ATRT3 Recommendations

On [30 November 2020](#), the Board approved all ATRT3 recommendations subject to prioritization[26].

Recommendation 1.1 To maximize the input from each Public Comment proceeding, ICANN org shall update the requirements per the following:
- Clearly identify who the intended audience is.
- Provide a clear list of precise key questions in plain language that the public consultation is seeking answers to from its intended audience.
- Where appropriate and feasible, include translations of the summary, key questions, and responses.
- Include results of these questions in the staff report.

Recommendation 1.2 With regards to other types of public input ICANN org shall:
- Develop and publish guidelines to assist in determining when a Public Comment process is required vs. alternate mechanisms for gathering input.
- Develop and publish guidelines for how alternative mechanisms for gathering input should operate, including producing final reports.
- Develop a system similar to and integrated with the Public Comment tracking system for all uses alternate mechanisms to gather input.
- Publish the complete "Public Comment Guidelines for the ICANN Organization."
- Resolve the issue of blog posts collecting feedback information when the "Public Comment Guidelines for the ICANN Organization" state that they "will not be used as mechanisms for collecting feedback."

Recommendation 2 ICANN org shall review the implementation of ATRT2 Recommendations in light of ATRT3's assessment and complete their implementation subject to prioritization (see recommendation on the creation of a prioritization process).

Recommendation 3.1 RDS Reviews

- Given the final results of the EPDP process will certainly have an impact on any future RDS Reviews (and could even remove the need for any further Specific Reviews on this topic) and considering that ATRT3's final report will be published prior to the EPDP delivering its final report, ATRT3 recommends suspending any further RDS Reviews until the next ATRT Review can consider the future of RDS Reviews in light of the final EPDP report recommendations, the results of the Board's consideration of these, as well as any other developments which affect Directory Services.

Recommendation 3.2 CCT Reviews

- There should be one additional and clearly scoped CCT Review.
- It shall start within the two years after the first introduction of the (possible) next round of new gTLDs to the root.
- It should be limited to a duration of one year.
- Additionally, a framework of data collection must be in place prior to the next round of gTLDs and the availability of all data sets should be confirmed prior to the selection

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[26] Recommendation 5 was an exception to the prioritization process and was considered prioritized.

of the review members and must be provided within 30 days of the review being launched.

Recommendation 3.3 SSR Reviews

- Given SSR2 will not be finalized prior to ATRT3 completing its work, ATRT3 recommends that SSR Reviews shall be suspended until the next ATRT Review (or any type of review that include current ATRT duties) which shall decide if these should be terminated, amended, or kept as is.
- This review could be re-activated at any time by the ICANN Board should there be a need for this.

Recommendation 3.4 ATRT Reviews

ATRT Reviews should continue essentially as they are currently constituted but with the following enhancements:

- Shall start no later than two years after the approval by the Board of the first recommendation of the Holistic Review.
- Shall maintain responsibility to recommend to the Board the termination or amendment of other periodic reviews and the creation of additional periodic reviews (including reassessing reviews terminated by previous ATRTs).
- All pre-identified documentation that is required for the review, such as the previous ATRT's implementation report, shall be available at the first meeting of the review team.
- Terms of reference shall be established at the first meeting.
- Note: The Operating Standards for Specific Reviews shall be amended to allow review teams to obtain professional services, which is not covered by subject matter experts, should they require such services.

Recommendation 3.5 A new Holistic Review of ICANN shall be set up:

- Timing considerations:
  - The first one shall start no later than one year after approval by the Board of the first recommendation by ATRT3.
  - The next Holistic Review shall start no later than every two-and-a-half years after the Board approved the first recommendation from ATRT4). This cadence would ensure a minimum of two continuous improvement assessments for each SO/AC/NC1 prior to holding the next Holistic Review.
  - The launching of any other review activities should be suspended while a Holistic Review is active.
  - Should operate based on Operating Standards for Specific Reviews and should be time limited to a maximum of 18 months.
- Objectives:
  - Review continuous improvement efforts of SO/AC/NC based on good practices.
  - Review the effectiveness of the various inter-SO/AC/NC collaboration mechanisms.
  - Review the accountability of SO/ACs or constituent parts to their members/constituencies (this will include an in-depth analysis of the survey results).
  - Review SO/AC/NC as a whole to determine if they continue to have a purpose within the ICANN structure as they are currently constituted, or if any changes in structures and operations are desirable to improve the overall

effectiveness of ICANN as well as ensure optimal representation of community views (but taking into consideration any impacts on the Board or the Empowered Community).

Recommendation 3.6: Organizational Reviews:

[Board and ICANN org] shall evolve the content of Organizational Reviews into continuous improvement programs in each SO/AC/NC:

- Continuous Improvement Program:
  - ICANN org shall work with each SO/AC/NC to establish a continuous improvement program. Such a continuous improvement program shall have a common base between all SOs, ACs, and the NC but will also allow for customization so as to best meet the needs of each individual SO/AC/NC. All SO/AC/NC shall have implemented a continuous improvement program within 18 months of this recommendation being approved by the Board. These continuous improvement programs will include:
    - Annual satisfaction survey of members/participants:
      - Each SO/AC/NC shall perform a comprehensive annual satisfaction survey, or equivalent mechanism, of its members/participants. The focus of the survey should be on member/constituent's satisfaction (and issue identification) vs their respective SO/AC/NC. It can also include satisfaction with ICANN org services such as staff support, travel services, translation services, etc.
      - For SOs and ACs that are composed of sub-structures this should apply to their individual sub-structures and the results of all sub-structures shall be aggregated to generate a result for the given SO or AC.
      - The results of these would be public and used to support the continuous improvement program as well as input for the Holistic Review. If the survey results note a significant issue, this shall be the trigger to initiate appropriate measures to deal with any such issues.
    - Regular assessment of continuous improvement programs:
      - At least everyone years each SO/AC/NC will undertake a formal process to evaluate and report on its continuous improvement activities which will be published for Public Comment.30 This would allow the Holistic Review to consider a minimum of two assessment reports and related public comments for each SO/AC/NC.
      - Details of the assessments will be defined during the elaboration of the continuous improvement program with each SO/AC/NC. If the SO/AC/NC desires and the budget permits, the assessment can be conducted by an independent contractor or by having an intensive one to five-day workshop.
      - The Board should publish at least every three years a summary of its continuous improvements over that period. These reports would be used as input for the Holistic Review.
    - Funding of the continuous improvement for SO/AC/NC:
      - This continuous improvement program is not meant to be a cost reduction activity vs current overall costs of Organizational Reviews over a 5-year period. ICANN shall ensure that, as a

minimum, the same overall budget is available for the continuous improvement efforts of the SO/AC/NC.
- Regardless of the processes selected by the specific SO/AC/NC, this shall fit in the financial constraints available for such activities.

Recommendation 4.1: ICANN org in strategic plans and operational plans shall provide a clear and concise rationale in plain language explaining how each goal, outcome, and operating initiative is critical to achieving the results of the one it is supporting (e.g., For each strategic goal there must be a rationale as to how it is critical for its strategic objective).

Recommendation 4.2: ICANN org in its strategic plans and operational plans shall have a clearly articulated, in plain language, specific criteria defining success which shall be S.M.A.R.T (unless appropriately justified) for all goals (strategic or not), outcomes (targeted or not), operating initiatives, etc.

Recommendation 4.3: For the FY2021- 2025 Strategic Plan and FY2021 Operating Plan, ICANN org shall, within six months of approving this recommendation, produce a supplementary document using the criteria defining success in reporting on the progress of any relevant goal, outcome, operating initiative, etc. to create a listing of required rationales and specific criteria defining success (as defined by ATRT3 in this recommendation) for each goal (strategic or not), outcome (targeted or not), operating initiatives, etc. that are found in both of these documents and post it for public consultation prior to finalization. Once finalized ICANN org will append these to the FY2021-2025 Strategic Plan and FY2021 Operating Plan and use the criteria defining success in all reporting on the progress of any relevant goal, outcome, operating initiative, etc.

Recommendation 4.4: ICANN org shall publish an annual status report on all Strategic Plan and Operating Plan goals, outcomes and operating initiatives. This should clearly assess each of the elements presented in the Strategic and Operating Plans (goals, outcomes etc.) clearly indicating what progress was made vs the target in concise and plain language. Prior to being finalized the report will be submitted for Public Comment.

Recommendation 4.5: ICANN org shall publish an overarching report at the conclusion of a strategic plan starting with the 2016-2020 Strategic Plan. This should clearly assess each of the elements presented in the strategic plan; its text (objectives, goals, outcomes) clearly indicate if it was attained or not and justify that assessment in concise and plain language. The report shall conclude with a section distilling the results of the assessments and how this could be applied to following strategic plans or their revisions. Prior to being finalized the report will be submitted for Public Comment.

Recommendation 5: ATRT3 recommends the following guidance for ICANN org in the creation of a community-led entity tasked with operating a prioritization process for recommendations made by review teams, cross-community groups, or any other community related budgetary elements the Board or ICANN org feels appropriate:

- ATRT3 recommends that all SO/ACs should have the option of participating in this annual process. Those SO/ACs wishing to participate in the prioritization process shall have one member per SO/AC. Additionally the Board and the org shall also each have a member. The Board shall also take into account the following high-level guidance for the prioritization process:
    - Shall operate by consensus of the individual SO/ACs, Board, and org members that are participating in the prioritization process.

- ○ Is meant to have a continuous dialogue with ICANN org during the preparation of the budget.
- ○ Shall consider WS2 recommendations which are required to complete the IANA transition and are subject to prioritization but must not be retired unless this is decided by the Board.
- ○ Must be conducted in an open, accountable, and transparent fashion and decisions justified and documented.
- ○ Shall integrate into the standard Operating and Financial Plan processes.
- ○ Can prioritize multiyear implementations, but these will be subject to annual reevaluation to ensure they still meet their implementation objectives and the needs of the community.
- ○ Shall consider the following elements when prioritizing recommendations:
  - ■ Relevance to ICANN's mission, commitments, core values, and strategic objectives.
  - ■ Value and impact of implementation.
  - ■ Cost of implementation and budget availability.
  - ■ Complexity and time to implement.
  - ■ Prerequisites and dependencies with other recommendations.
  - ■ Relevant information from implementation shepherds (or equivalents).

Appendix B: Board-Approved CCT Recommendations

On 1 March 2019, the Board accepted six CCT recommendations (1, 17, 21, 22, 30, and 31), subject to costing and implementation considerations.

On 22 October 2020, the Board approved eleven CCT recommendations (6, 7, 8, 11, 13, 16, 18, 20, 23, 24, and 26), subject to prioritization.

Recommendation 1: Formalize and promote ongoing data collection.

Recommendation 6: Partner with mechanisms and entities involved with the collection of TLD data. As feasible, collect TLD registration number data per TLD and registrar at a country-by-country level in order to perform analysis based on the same methods used in the Latin American and Caribbean DNS Marketplace (LAC) Study.

Recommendation 7: Collect domain usage data to better understand the implications of parked domains.

Recommendation 8: Conduct periodic surveys of registrants that gathers both objective and subjective information with a goal of creating more concrete and actionable information.

Recommendation 11: Conduct periodic end-user consumer surveys. Future review teams should work with survey experts to conceive more behavioral measures of consumer trust that gather both objective and subjective data with a goal toward generating more concrete and actionable information.

Recommendation 13: ICANN should collect data in conjunction with its related data-collection activities on the impact of restrictions on who can buy domains within certain new gTLDs (registration restrictions) to help regularly determine and report:

(1).Whether consumers and registrants are aware that certain new gTLDs have registration restrictions;

(2).Compare consumer trust levels between new gTLDs with varying degrees of registration restrictions;

(3).Determine whether the lower abuse rates associated with gTLDs that impose stricter registration policies identified in the "Statistical Analysis of DNS Abuse in gTLDs" study continue to be present within new gTLDs that impose registration restrictions as compared with new gTLDs that do not;

(4).Assess the costs and benefits of registration restrictions to contracted parties and the public (to include impacts on competition and consumer choice); and

(5).Determine whether and how such registration restrictions are enforced or challenged.

Recommendation 16[27]: Further study the relationship between specific registry operators, registrars, and DNS Security Abuse by commissioning ongoing data collection, including but not limited to, the ICANN Domain Abuse Activity Reporting (DAAR) initiative. For

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[27] Language in colored font was passed through to community groups identified by the CCT Review Team. See the 1 March 2019 Board action for more information.

transparency purposes, this information should be regularly published, ideally quarterly and no less than annually, in order to enable identification of registries and registrars that require greater scrutiny, investigation, and potential enforcement action by the ICANN organization. Upon identifying abuse phenomena, ICANN should put in place an action plan to respond to such studies, remedy problems identified, and define future ongoing data collection.

Recommendation 17: ICANN should collect data about and publicize the chain of parties responsible for gTLD domain name registrations.

Recommendation 18: In order for the upcoming WHOIS Review Team to determine whether additional steps are needed to improve WHOIS accuracy, and whether to proceed with the "identity" phase of the Accuracy Reporting System (ARS) project, ICANN should gather data to assess whether a significant percentage of WHOIS-related complaints applicable to new gTLDs relate to the accuracy of the identity of the registrant. This should include analysis of WHOIS accuracy complaints received by ICANN Contractual Compliance to identify the subject matter of the complaints (e.g., complaints about syntax, operability, or identity). The volume of these complaints between legacy gTLDs and new gTLDs should also be compared. ICANN should also identify other potential data sources of WHOIS complaints beyond those that are contractually required (including, but not limited to, complaints received directly by registrars, registries, ISPs, etc.) and attempt to obtain anonymized data from these sources.
Future CCT Review Teams may then also use these data.

Recommendation 20[28]: Assess whether mechanisms to report and handle complaints have led to more focused efforts to combat abuse by determining:

(1) the volume of reports of illegal conduct in connection with the use of the TLD that registries receive from governmental and quasi-governmental agencies;

(2) the volume of inquires that registries receive from the public related to malicious conduct in the TLD;

(3) whether more efforts are needed to publicize contact points to report complaints that involve abuse or illegal behavior within a TLD; and

(4) what actions registries have taken to respond to complaints of illegal or malicious conduct in connection with the use of the TLD.

Such efforts could include surveys, focus groups, or Community discussions. If these methods prove ineffective, consideration could be given to amending future standard Registry Agreements to require registries to more prominently disclose their abuse points of contact and provide more granular information to ICANN. Once this information is gathered, future review teams should consider recommendations for appropriate follow up measures.

Recommendation 21: Include more detailed information on the subject matter of complaints in ICANN publicly available Contractual Compliance reports. Specifically, more precise data on the subject matter of complaints should be included, particularly:

(1) the class/type of abuse;

(2) the gTLD that is target of the abuse;

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[28] Language in colored font was passed through to community groups identified by the CCT Review Team. See the 1 March 2019 Board action for more information.

(3) the safeguard that is at risk;

(4) an indication of whether complaints relate to the protection of sensitive health or financial information;

(5) what type of contractual breach is being complained of; and

(6) resolution status of the complaints, including action details.

These details would assist future review teams in their assessment of these safeguards.

Recommendation 22: Initiate engagement with relevant stakeholders to determine what best practices are being implemented to offer reasonable and appropriate security measures commensurate with the offering of services that involve the gathering of sensitive health and financial information. Such a discussion could include identifying what falls within the categories of "sensitive health and financial information," and what metrics could be used to measure compliance with this safeguard.

Recommendation 23: ICANN should gather data on new gTLDs operating in highlyregulated sectors to include the following elements:

a. A survey to determine 1) the steps registry operators are taking to establish working relationships with relevant government or industry bodies, and 2) the volume of complaints received by registrants from government and regulatory bodies and their standard practices to respond to those complaints;

b. A review of a sample of domain websites within the highly-regulated sector category to assess whether contact information to file complaints is sufficiently easy to find;

c. An inquiry to ICANN Contractual Compliance and registrars/resellers of highly-regulated domains seeking sufficiently detailed information to determine the volume and the subject matter of complaints regarding domains in highly-regulated industries.

d. An inquiry to registry operators to obtain data to compare rates of abuse between those highly-regulated gTLDs that have voluntarily agreed to verify and validate credentials to those highly-regulated gTLDs that have not.

e. An audit to assess whether restrictions regarding possessing necessary credentials are being enforced by auditing registrars and resellers offering the highly-regulated TLDs (i.e., can an individual or entity without the proper credentials buy a highly-regulated domain?).

To the extent that current ICANN data collection initiatives and Contractual Compliance audits could contribute to these efforts, the review team recommends that ICANN assess the most efficient way to proceed to avoid duplication of effort and leverage current work.

Recommendation 24:
a. Determine whether ICANN Contractual Compliance should report on a quarterly basis whether it has received complaints for a registry operator's failure to comply with either the safeguard related to gTLDs with inherent governmental functions or the safeguard related to cyberbullying.

b. Survey registries to determine 1) whether they receive complaints related to cyberbullying and misrepresenting a governmental affiliation, and 2) how they enforce these safeguards.

Recommendation 26: A study to ascertain the impact of the New gTLD Program on the costs required to protect trademarks in the expanded DNS marketplace should be repeated at regular intervals to see the evolution of those costs over time. The CCT Review Team recommends that the next study be completed within 18 months after issuance of the CCT final report, and that subsequent studies be repeated every 18 to 24 months.
The CCT Review Team acknowledges that the Nielsen survey of INTA members in 2017 was intended to provide insight into this topic but yielded a lower response rate than anticipated. The Team recommends a more user-friendly and perhaps shorter survey to help ensure a higher and more statistically representative response rate.

Recommendation 30: Expand and improve outreach into the Global South.

Recommendation 31: The ICANN organization to coordinate the pro bono assistance program.

Appendix C: Passed-Through CCT Recommendations

On 1 March 2019, the Board passed through 14 CCT recommendations (9, 10, 12, 16, 19, 20, 25, 27, 28, 29, 32, 33, 34, and 35), in whole on in part, to the community groups identified by the CCT Review Team, for consideration:

Recommendation 9: The ICANN community should consider whether the costs related to defensive registration for the small number of brands registering a large number of domains can be reduced.

Passed through to: New gTLD Subsequent Procedures PDP Working Group and/or Rights Protection Mechanisms (RPM) PDP Working Group

Recommendation 10: The GNSO should initiate a new Policy Development Process (PDP) to create a consistent privacy baseline across all registries, including to explicitly cover cases of privacy infringements such as sharing or selling personal data without a lawful basis, such as the consent of that person. The GNSO PDP should consider limiting the collection and processing of personal data within rules which are mandatory for all gTLD registries. It should also consider not allowing registries to share personal data with third parties without a lawful basis, such as the consent of that person or under circumstances defined by applicable law (e.g. upon requests of government agencies, IP lawyers, etc.). Also, it is necessary to be aware of emerging, applicable regulations related to the processing of the personal data. For clarification, this recommendation does not relate to issues involving WHOIS or registration directory services data.

Passed through to: Generic Names Supporting Organization

Recommendation 12: Create incentives and/or eliminate current disincentives that encourage gTLD registries to meet user expectations regarding: (1) the relationship of content of a gTLD to its name; (2) restrictions as to who can register a domain name in certain gTLDs based upon implied messages of trust conveyed by the name of its gTLDs (particularly in sensitive or regulated industries) and (3) the safety and security of users' personal and sensitive information (including health and financial information). These incentives could relate to applicants who choose to make public interest commitments in their applications that relate to these expectations. Ensure that applicants for any subsequent rounds are aware of these public expectations by inserting information about the results of the ICANN surveys in the Applicant Guide Books.

Passed through to: New gTLD Subsequent Procedures PDP Working Group

Recommendation 16[29]: Further study the relationship between specific registry operators, registrars, and DNS Security Abuse by commissioning ongoing data collection, including but not limited to, ICANN Domain Abuse Activity Reporting (DAAR) initiatives. For transparency purposes, this information should be regularly published, ideally quarterly and no less than annually, in order to be able to identify registries and registrars that need to come under greater scrutiny, investigation, and potential enforcement action by ICANN organization. Upon identifying abuse phenomena, ICANN should put in place an action plan to respond to such studies, remedy problems identified, and define future ongoing data collection.

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[29] Language in colored font was put in pending status on 1 March 2019 and subsequently approved by the Board, subject to prioritization, on 20 October 2020.

Passed through to: The Registry Stakeholders Group, the Registrar Stakeholders Group, the Generic Names Supporting Organization, and the Subsequent Procedures PDP WG, SSR2 Review Team.

Recommendation 19: The next CCT should review the "Framework for Registry Operator to Respond to Security Threats" and assess whether the framework is a sufficiently clear and effective mechanism to mitigate abuse by providing for systemic and specified actions in response to security threats.

Passed through to: Future CCT Review Teams.

Recommendation 20[30]: Assess whether mechanisms to report and handle complaints have led to more focused efforts to combat abuse by determining: (1) the volume of reports of illegal conduct in connection with the use of the TLD that registries receive from governmental and quasi-governmental agencies; (2) the volume of inquires that registries receive from the public related to malicious conduct in the TLD; (3) whether more efforts are needed to publicize contact points to report complaints that involve abuse or illegal behavior within a TLD; and (4) what actions registries have taken to respond to complaints of illegal or malicious conduct in connection with the use of the TLD. Such efforts could include surveys, focus groups, or community discussions. If these methods proved ineffective, consideration could be given to amending future standard Registry Agreements to require registries to more prominently disclose their abuse points of contact and provide more granular information to ICANN. Once this information is gathered, future review teams should consider recommendations for appropriate follow up measures.

Passed through to: Future CCT Review Teams.

Recommendation 25: To the extent voluntary commitments are permitted in future gTLD application processes, all such commitments made by a gTLD applicant must state their intended goal and be submitted during the application process so that there is sufficient opportunity for community review and time to meet the deadlines for community and Limited Public Interest objections. Furthermore, such requirements should apply to the extent that voluntary commitments may be made after delegation. Such voluntary commitments, including existing voluntary PICs, should be made accessible in an organized, searchable online database to enhance data-driven policy development, community transparency, ICANN compliance, and the awareness of variables relevant to DNS abuse trends.

Passed through to: New gTLD Subsequent Procedures PDP Working Group

Recommendation 27: Since the review team's initial draft recommendation, the PDP "Review of All Rights Protection Mechanisms in All gTLDs (RPM WG)" has started reviewing the Uniform Rapid Suspension system in detail and this is currently ongoing. Given this ongoing review, the CCT Review Team recommends that the RPM WG continues its review of the URS and also looks into the interoperability of the URS with the Uniform Domain Name Dispute Resolution Policy (UDRP). Given the current timeline, it would appear that the appropriate time to do so will be when the UDRP review is carried out by the PDP WG and at this time consideration be given to how it should interoperate with the UDRP. The review team has encountered a lack of data for complete analysis in many respects. The RPM PDP WG appears to also be encountering this issue and this may well prevent it drawing firm conclusions. If modifications are not easily identified, then the review team recommends

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[30] Language in colored font was put in pending status on 1 March 2019 and subsequently approved by the Board, subject to prioritization, on 20 October 2020.

continued monitoring until more data is collected and made available for a review at a later date.

Passed through to: Generic Names Supporting Organization

Recommendation 28: A cost-benefit analysis and review of the Trademark Clearinghouse (TMCH) and its scope should be carried out to provide quantifiable information on the costs and benefits associated with the present state of the TMCH services and thus to allow for an effective policy review.40 Since our initial draft recommendation, the RPM PDP has started reviewing the TMCH in detail and ICANN has appointed Analysis Group to develop and conduct the survey(s) to assess the use and effectiveness of the Sunrise and Trademark Claims RPMs. Provided that the RPM PDP has sufficient data from this survey or other surveys and is able to draw firm conclusions, the CCT Review Team does not consider that an additional review is necessary. However, the CCT Review Team reiterates its recommendation for a cost-benefit analysis to be carried out if such analysis can enable objective conclusions to be drawn. Such cost-benefit analysis should include but not necessarily be limited to looking at cost to brand owners, cost to registries, and cost to registrars of operating with the TMCH now and going forward and look at the interplay with premium pricing.

Passed through to: Generic Names Supporting Organization

Recommendation 29: Set objectives/metrics for applications from the Global South.

Passed through to: New gTLD Subsequent Procedures PDP Working Group, Generic Supporting Names Organization

Recommendation 32: Revisit the Applicant Support Program.

Passed through to: New gTLD Subsequent Procedures PDP Working Group

Recommendation 33: As required by the October 2016 Bylaws, Governmental Advisory Committee (GAC) consensus advice to the Board regarding gTLDs should also be clearly enunciated, actionable, and accompanied by a rationale, permitting the Board to determine how to apply that advice. ICANN should provide a template to the GAC for advice related to specific TLDs, in order to provide a structure that includes all of these elements. In addition to providing a template, the Applicant Guidebook (AGB) should clarify the process and timelines by which GAC advice is expected for individual TLDs.

Passed through to: New gTLD Subsequent Procedures PDP Working Group, GAC

Recommendation 34: A thorough review of the procedures and objectives for community-based applications should be carried out and improvements made to address and correct the concerns raised before a new gTLD application process is launched. Revisions or adjustments should be clearly reflected in an updated version of the 2012 AGB.

Passed through to: New gTLD Subsequent Procedures PDP Working Group

Recommendation 35: The New gTLD Subsequent Procedures PDP should consider adopting new policies to avoid the potential for inconsistent results in string confusion objections. In particular, the PDP should consider the following possibilities:
1. Determining through the initial string similarity review process that singular and plural versions of the same gTLD string should not be delegated.

2. Avoiding disparities in similar disputes by ensuring that all similar cases of plural versus singular strings are examined by the same expert panelist.
3. Introducing a post-dispute resolution panel review mechanism.

<u>Passed through to</u>: New gTLD Subsequent Procedures PDP Working Group

Appendix D: CCT Recommendations Pending Board Consideration

On 1 March 2019, the Board placed 17 recommendations (2, 3, 4, 5, 6, 7, 8, 11, 13, 14, 15, 16, 18, 20, 23, 24, and 26) in pending status, in whole or in part.

Four recommendations (2, 3, 4, and 5) out of the 17 CCT recommendations the Board put in pending status, on 1 March 2019, remain pending Board consideration:

Recommendation 2: Collect wholesale pricing for legacy gTLDs.

Recommendation 3: Collect transactional pricing for the gTLD marketplace.

Recommendation 4: Collect retail pricing for the domain marketplace.

Recommendation 5: Collect secondary market data.

Appendix E: Rejected CCT Recommendations

On 10 September 2023, the Board rejected two CCT recommendations (14 and 15) it had placed in pending status on 1 March 2019:

Recommendation 14: Consider directing ICANN organization, in its discussions with registries, to negotiate amendments to existing Registry Agreements, or in consideration of new Registry Agreements associated with subsequent rounds of new gTLDs, to include provisions in the agreements to provide incentives, including financial incentives for registries, especially open registries, to adopt proactive anti-abuse measures.

Board Rationale for Rejection: The Board has aligned on the following working baseline definition of DNS abuse for ICANN: "DNS abuse includes five broad categories of harmful activity: Phishing, Malware, Botnet Command and Control, SPAM when used as a vector, and Pharming." The Board recognizes this working definition is neither an exhaustive list nor a criteria-based definition and may need adjusting in the future as DNS abuse evolves. However, it brings together a set of agreed upon DNS security threats to which policy and mitigation work within ICANN can take place immediately, while or if definitions continue to be debated. The Board recognizes the progress of the proposed amendments to the Registrar Accreditation Agreement and Base gTLD Registry Agreement that plan to add obligations to mitigate DNS Abuse. Subsequent to the potential incorporation of these amendments into contracts, the community may determine, as appropriate, if policy work would be beneficial to further combat DNS Abuse. Preventative measures, as envisioned in this recommendation, are a possible topic of such community discussions. The Board acknowledges that this recommendation was assigned a high priority level by the Review Team. For this reason, the Board appreciates the extensive work conducted by ICANN org to investigate financial incentives by and for registries. ICANN org's findings show that there are specific incentives that some registries, including ccTLDs, have introduced, especially towards their registrars, to support anti-abuse measures. However, at present there is no clear evidence that such incentives ICANN could offer to registries would have the desired impact of preventing DNS abuse from occurring within a TLD. Consequently, the Board believes that there are not sufficient grounds to direct ICANN org to implement this recommendation which, therefore, is rejected. Additionally, the Board encourages ICANN org to continue its existing efforts to educate stakeholders on the importance of working together to prevent, mitigate, contain and act on possible DNS abuse, and to continue to remain vigilant on possible actions to further combat DNS Abuse.

Recommendation 15: ICANN Org should, in its discussions with registrars and registries, negotiate amendments to the Registrar Accreditation Agreement and Registry Agreements to include provisions aimed at preventing systemic use of specific registrars or registries for DNS Security Abuse. With a view to implementing this recommendation as early as possible, and provided this can be done, then this could be brought into effect by a contractual amendment through the bilateral review of the Agreements. In particular, ICANN should establish thresholds of abuse at which compliance inquiries are automatically triggered, with a higher threshold at which registrars and registries are presumed to be in default of their agreements. If the community determines that ICANN org itself is ill-suited or unable to enforce such provisions, a DNS Abuse Dispute Resolution Policy (DADRP) should be considered as an additional means to enforce policies and deter against DNS Security Abuse. Furthermore, defining and identifying DNS Security Abuse is inherently complex and would benefit from analysis by the community, and thus we specifically recommend that the ICANN Board prioritize and support community work in this area to enhance safeguards and trust due to the negative impact of DNS Security Abuse on consumers and other users of the Internet.

<u>Board Rationale for Rejection:</u> The Board acknowledges the remit and roles of the different parts of the ICANN community and notes that since January 2023, ICANN org has been actively engaged in a contract amendment process with the Registries and Registrars to add a clearly defined obligation to mitigate or disrupt DNS abuse in each agreement. The recommendation calls for outcomes that are contingent on community work. The recommendation states that ICANN should establish thresholds of abuse at which compliance inquiries are automatically triggered, with a higher threshold at which registrars and registries are presumed to be in default of their agreements. However, the Board notes that ICANN Contractual Compliance's role is to bring registrars into compliance with the Registrar Accreditation Agreement (RAA) regardless of whether or not a specific "complaint threshold" has been reached. The Board recognizes the ICANN org assessment that a potential DNS Abuse Dispute Resolution Policy would not be an effective means to enforce policies and deter against DNS Security Abuse as any action on DNS abuse should be enforced in a timely manner. It is the view of the Board that the community should determine what policy work is needed and how it wishes to prioritize such efforts to enhance safeguards and trust due to the negative impact of DNS Security Abuse on consumers and other users of the Internet. As discussed above, ICANN has included efforts to combat DNS abuse in partnership with relevant industry partners in ICANN's strategic plan, has made significant progress to date and is encouraged by the community dialogue. Therefore, considering the outcome of the extensive analysis of each of the components of this Recommendation, while acknowledging that this Recommendation was marked as a "prerequisite" by the Review Team and remaining fully supportive of compliance actions towards registries and registrars who fail to meet their contractual obligations, as well as of any community work to enhance DNS abuse safeguards, the Board rejects this recommendation.

Appendix F: Board-Approved RDS-WHOIS2 Recommendations

On 25 February 2020, the Board approved 15 RDS-WHOIS2 recommendations (R1.1, R1.2, R1.3, R3.1, R3.2, R10.2, R11.2, R12.1, R15.1, LE.1, LE.2, SG.1, CC.1, CC.2, CC.3), in whole or in part, subject to prioritization.

Recommendation 1.1: To ensure that RDS (WHOIS) is treated as a strategic priority, the ICANN Board should put into place a forward-looking mechanism to monitor possible impacts on the RDS (WHOIS) from legislative and policy developments around the world.

Recommendation 1.2: To support this mechanism, the ICANN Board should instruct the ICANN organization to assign responsibility for monitoring legislative and policy development around the world and to provide regular updates to the ICANN Board.

Recommendation 1.3: The ICANN Board, in drafting the Charter of a Board working group on RDS, should ensure the necessary transparency of the group's work, such as by providing for records of meetings and meeting minutes, to enable future review of its activities.

Recommendation 3.1: The ICANN Board should direct the ICANN organization to update all of the information related to RDS (WHOIS) and by implication other information related to the registration of second-level gTLDs domains. The content should be revised to make the information readily accessible and understandable, and it should provide details of when and how to interact with ICANN organization or contracted parties. Although not the sole focus of this recommendation, interactions with ICANN organization Contractual Compliance, such as when filing WHOIS Inaccuracy Reports, should be a particular focus. The revision of this web documentation and instructional material should not be undertaken as a purely internal operation but should include users and potentially focus groups to ensure that the final result fully meets the requirements. The resultant outward facing documentation of registrant and RDS (WHOIS) issues should be kept up to date as changes are made to associated policy or processes.

Recommendation 3.2: With community input, the ICANN Board should instruct the ICANN organization to identify groups outside of those that routinely engage with ICANN organization, and these should be targeted through RDS (WHOIS) outreach. An RDS (WHOIS) outreach plan should then be developed, executed, and documented. There should be an ongoing commitment to ensure that as RDS (WHOIS) policy and processes change, the wider community is made aware of such changes. WHOIS inaccuracy reporting was identified as an issue requiring additional education and outreach and may require a particular focus. RDS (WHOIS) outreach should be included when considering communications in underserved regions. The need for and details of the outreach may vary depending on the ultimate General Data Protection Regulation (GDPR) implementation and cannot be detailed at this point.

Recommendation 10.2: Reviewing the effectiveness of the implementation of WHOIS1 Recommendation #10 should be deferred. The ICANN Board should recommend that review be carried out by the next RDS (WHOIS) Review Team after PPSAI Policy is implemented.

Recommendation 11.2: The ICANN Board should direct the ICANN organization to ensure that the common interface displays all applicable output for each gTLD domain name registration as available from contracted parties, including multiple versions when the

outputs from registry and registrar differ. The common interface should be updated to address any policy or contractual changes to maintain full functionality.

Recommendation 12.1: Reviewing the effectiveness of the implementation of Recs #12-14 should be deferred. The ICANN Board should recommend that review to be carried out by the next RDS Review Team after RDAP is implemented, and the translation and transliteration of the registration data launches.

Recommendation 15.1: The ICANN Board should ensure that implementation of RDS-WHOIS2 Review Team recommendations is based on best practice project management methodology, ensuring that plans and implementation reports clearly address progress, and applicable metrics and tracking tools are used for effectiveness and impact evaluation.

Recommendation LE.1: The ICANN Board should resolve that ICANN organization conduct regular data gathering through surveys and studies to inform a future assessment of the effectiveness of RDS (WHOIS) in meeting the needs of law enforcement. This will also aid future policy development (including the current Temporary Specification for gTLD Registration Data Expedited Policy Development Process and related efforts).

Recommendation LE.2: The ICANN Board should consider conducting comparable surveys and/or studies (as described in LE.1) with other RDS (WHOIS) users working with law enforcement on a regular basis.

Recommendation SG.1: The ICANN Board should require that the ICANN org, in consultation with data security and privacy expert(s), ensure that all contracts with contracted parties (to include Privacy/Proxy services when such contracts exist) include uniform and strong requirements for the protection of registrant data and for ICANN to be notified in the event of any data breach. The data security expert(s) should also consider and advise on what level or magnitude of breach warrants such notification. In carrying out this review, the data security and privacy expert(s) should consider to what extent GDPR regulations, which many but not all ICANN contracted parties are subject to, could or should be used as a basis for ICANN requirements. The ICANN Board should initiate action intended to effect such changes. The ICANN Board should consider whether and to what extent notifications of breaches that it receives should be publicly disclosed.

Recommendation CC.1[31]: The ICANN Board should initiate action intended to ensure that gTLD domain names suspended due to RDS (WHOIS) contact data which the registrar knows to be incorrect, and that remains incorrect until the registration is due for deletion, should be treated as follows:

(1) The RDS (WHOIS) record should include a notation that the domain name is suspended due to incorrect data; and

(2) Domain names with this notation should not be unsuspended without correcting the data.

Recommendation CC.2: The ICANN Board should initiate action intended to ensure that all gTLD domain name registration directory entries contain at least one full set of either registrant or admin contact details comparable to those required for new registrations under the 2013 RAA (or any subsequent version thereof) or applicable policies.

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[31] Recommendation CC.1 was approved in part and passed through in part to the Generic Names Supporting Organization Council for consideration. See the 25 February 2020 Board action for more information.

Recommendation CC.3: The ICANN Board should take steps to ensure that ICANN Contractual Compliance is adequately resourced factoring in any increase in workload due to additional work required due to compliance with GDPR or other legislation/regulation.

Appendix G: Passed-Through RDS-WHOIS2 Recommendations

On 25 February 2020, the Board passed through two RDS-WHOIS2 recommendations (R11.1 and BY.1), in whole or in part, to the Generic Names Supporting Organization Council, for consideration.

Recommendation CC.4: The ICANN Board should recommend the GNSO adopt a risk-based approach to incorporating requirements for measurement, auditing, tracking, reporting and enforcement in all new RDS policies.

Passed through in whole to: Generic Names Supporting Organization Council

Recommendation CC.1[32]: The ICANN Board should initiate action intended to ensure that gTLD domain names suspended due to RDS (WHOIS) contact data which the registrar knows to be incorrect, and that remains incorrect until the registration is due for deletion, should be treated as follows: (1) The RDS (WHOIS) record should include a notation that the domain name is suspended due to incorrect data; and (2) Domain names with this notation should not be unsuspended without correcting the data.

Passed through in part to: Generic Names Supporting Organization Council

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[32] Recommendation CC.1 was approved by ICANN org and passed through to the Generic Names Supporting Organization Council for consideration. See the 25 February 2020 Board action for more information.

Appendix H: RDS-WHOIS2 Recommendations Pending Board Consideration

On 25 February 2020, the Board placed four RDS-WHOIS2 recommendations (4.1, 4.2, 5.1, 10.1) in pending status:

Recommendation 4.1: The ICANN Board should initiate action to ensure ICANN Contractual Compliance is directed to proactively monitor and enforce registrar obligations with regard to RDS (WHOIS) data accuracy using data from incoming inaccuracy complaints and RDS accuracy studies or reviews to look for and address systemic issues. A risk-based approach should be executed to assess and understand inaccuracy issues and then take the appropriate actions to mitigate them.

Recommendation 4.2: The ICANN Board should initiate action to ensure that ICANN Contractual Compliance is directed to cross-reference existing data from incoming complaints and studies such as the ARS to detect patterns of failure to validate and verify RDS (WHOIS) data as required by the RAA. When such a pattern is detected, compliance action or an audit should be initiated to review compliance of the Registrar with RDS (WHOIS) contractual obligations and consensus policies.

Recommendation 5.1: The Accuracy Reporting System, which was instituted to address concerns regarding RDS (WHOIS) contact data accuracy has demonstrated that there is still an accuracy concern and therefore such monitoring must continue. ICANN organization should continue to monitor accuracy and/or contactability through either the ARS or a comparable tool/methodology.

Recommendation 10.1: The Board should monitor the implementation of the PPSAI. If the PPSAI policy does not become operational by 31 December 2019, the ICANN Board should ensure an amendment to the 2013 RAA (or successor documents) is proposed that ensures that the underlying registration data of domain name registrations using Privacy/Proxy providers affiliated with registrars shall be verified and validated in application of the verification and validation requirements under the RAA unless such verification or validation has already occurred at the registrar level for such domain name registrations.

Appendix I: Rejected RDS-WHOIS2 Recommendations

On 25 February 2020, the Board rejected two RDS-WHOIS2 recommendations (Recommendations 11.1 and BY.1).

Recommendation 11.1: The ICANN Board should direct the ICANN organization to define metrics or SLAs to be tracked and evaluated to determine consistency of results of queries and use of any common interface (existing or future) used to provide one-stop access to registration data across all gTLDs and registrars/resellers. Specific metrics that should be tracked for any such common interface include:
- How often are RDS (WHOIS) fields returned blank?
- How often is data displayed inconsistently (for the same domain name), overall and per gTLD?
- How often does the tool not return any results, overall and per gTLD?
- What are the causes for the above results?

Board Rationale for Rejection: The Board rejects this recommendation as the interface tool referenced in the recommendation is no longer in use. In July 2019, ICANN org launched a Registration Data Access Protocol (RDAP) lookup service. This new lookup service standardized data access and query response formats and allowed for ICANN to be removed from the transaction of a registration data lookup. ICANN org will also disseminate additional information on use of this tool as part of the overall education effort regarding RDAP. In light of this, the Board has chosen not to accept this recommendation as it is no longer applicable. This is in alignment with clarification received from RDS-WHOIS2 Implementation Shepherds in the 29 January 2020 discussion with the RDS Board Caucus Group.

Recommendation BY.1: The ICANN Board should take action to extend the reference to "safeguarding registrant data" in ICANN Bylaws section 4.6(e)(ii) and replace section 4.6(e)(iii) of the ICANN Bylaws (which refers to the OECD Guidelines) with a more generic requirement for RDS (WHOIS) Review Teams to assess how well RDS (WHOIS) policy and practice addresses applicable data protection and cross border data transfer regulations, laws and best practices.

Board Rationale for Rejection: The Board rejects this recommendation, as approving such a recommendation does not appear to be in the best interests of ICANN. The Board notes that if this or a future Accountability and Transparency Review Team recommends changes to the scope of the RDS Review (as is within the ATRT mandate), the Board will consider such recommendations at the appropriate time.

Appendix J: Board-Approved SSR2 Recommendations

On 22 July 2021, the Board took action to approve 13 recommendations (1.1, 4.1, 5.1, 5.2, 9.1, 10.1, 16.1, 21.1, 22.1, 22.2, 23.1, 23.2 and 24.2), subject to prioritization.

On 1 May 2022, the Board took action to approve 1 recommendation (5.4) subject to prioritization.

On 16 November 2022, the Board took action to approve 2 recommendations (5.3 and 7.5) subject to prioritization, and to approve 7 recommendations (3.2, 3.3, 7.1, 7.2, 7.3, 11.1, 24.1) as fully implemented.

On 10 September 2023, the Board took action to approve one SSR2 recommendation (13.2) as fully implemented.

Recommendation 1.1: The ICANN Board and ICANN org should perform a further comprehensive review of the SSR1 recommendations and execute a new plan to complete the implementation of the SSR1 Recommendations (see Appendix D: Findings Related to SSR1 Recommendations).

Recommendation 3.2: The ICANN Board and ICANN org should ensure specific budget items relating to ICANN org's performance of SSR-related functions are linked to specific ICANN strategic plan goals and objectives. ICANN org should implement those mechanisms through a consistent, detailed, annual budgeting and reporting process.

Recommendation 3.3: The ICANN Board and ICANN org should create, publish, and request public comment on detailed reports regarding the costs and SSR-related budgeting as part of the strategic planning cycle.

Recommendation 4.1: ICANN org should continue centralizing its risk management and clearly articulate its Security Risk Management Framework and ensure that it aligns strategically with the organization's requirements and objectives. ICANN org should describe relevant measures of success and how to assess them.

Recommendation 5.1: ICANN org should implement an ISMS and be audited and certified by a third party along the lines of industry security standards (e.g., ITIL, ISO 27000 family, SSAE-18) for its operational responsibilities. The plan should include a road map and milestone dates for obtaining certifications and noting areas that will be the target of continuous improvement.

Recommendation 5.2: Based on the ISMS, ICANN org should put together a plan for certifications and training requirements for roles in the organization, track completion rates, provide rationale for their choices, and document how the certifications fit into ICANN org's security and risk management strategies.

Recommendation 5.3: ICANN org should require external parties that provide services to ICANN org to be compliant with relevant security standards and document their due diligence regarding vendors and service providers.

Recommendation 5.4: ICANN org should reach out to the community and beyond with clear reports demonstrating what ICANN org is doing and achieving in the security space. These reports would be most beneficial if they provided information describing how ICANN org

follows best practices and mature, continually-improving processes to manage risk, security, and vulnerabilities.

Recommendation 7.1: ICANN org should establish a Business Continuity Plan for all the systems owned by or under the ICANN org purview, based on ISO 22301 "Business Continuity Management," identifying acceptable BC and DR timelines.

Recommendation 7.2: ICANN org should ensure that the DR plan for Public Technical Identifiers (PTI) operations (i.e., IANA functions) includes all relevant systems that contribute to the security and stability of the DNS and also includes Root Zone Management and is in line with ISO 27031. ICANN org should develop this plan in close cooperation with the Root Server System Advisory Committee (RSSAC) and the Root Server Operators (RSO).

Recommendation 7.3: ICANN org should also establish a DR plan for all the systems owned by or under the ICANN org purview, again in line with ISO 27031.

Recommendation 7.5: ICANN org should publish a summary of their overall BC and DR plans and procedures. Doing so would improve transparency and trustworthiness beyond addressing ICANN org's strategic goals and objectives. ICANN org should engage an external auditor to verify compliance with these BC and DR plans.

Recommendation 9.1: The ICANN Board should direct the compliance team to monitor and strictly enforce the compliance of contracted parties to current and future SSR and abuse related obligations in contracts, baseline agreements, temporary specifications, and community policies.

Recommendation 10.1: ICANN org should post a webpage that includes their working definition of DNS abuse, i.e., what it uses for projects, documents, and contracts. The definition should explicitly note what types of security threats ICANN org currently considers within its remit to address through contractual and compliance mechanisms, as well as those ICANN org understands to be outside its remit. If ICANN org uses other similar terminology—e.g., security threat, malicious conduct—ICANN org should include both its working definition of those terms and precisely how ICANN org is distinguishing those terms from DNS abuse. This page should include links to excerpts of all current abuse-related obligations in contracts with contracted parties, including any procedures and protocols for responding to abuse. ICANN org should update this page annually, date the latest version, and link to older versions with associated dates of publication.

Recommendation 11.1: The ICANN community and ICANN org should take steps to ensure that access to Centralized Zone Data Service (CZDS) data is available, in a timely manner and without unnecessary hurdles to requesters, e.g., lack of auto-renewal of access credentials.

Recommendation 13.2: ICANN org should publish the number of complaints made in a form that allows independent third parties to analyze the types of complaints on the DNS.

Recommendation 16.1: ICANN org should provide consistent cross-references across their website to provide cohesive and easy-to-find information on all actions—past, present, and planned—taken on the topic of privacy and data stewardship, with particular attention to the information around the RDS.

Recommendation 21.1: ICANN org and PTI operations should accelerate the implementation of new RZMS security measures regarding the authentication and

authorization of requested changes and offer TLD operators the opportunity to take advantage of those security measures, particularly MFA and encrypted email.

Recommendation 22.1: For each service that ICANN org has authoritative purview over, including root-zone and gTLD-related services as well as IANA registries, ICANN org should create a list of statistics and metrics that reflect the operational status (such as availability and responsiveness) of that service, and publish a directory of these services, data sets, and metrics on a single page on the icann.org website, such as under the Open Data Platform. ICANN org should produce measurements for each of these services as summaries over both the previous year and longitudinally (to illustrate baseline behavior).

Recommendation 22.2: ICANN org should request community feedback annually on the measurements. That feedback should be considered, publicly summarized after each report, and incorporated into follow-on reports. The data and associated methodologies used to measure these reports' results should be archived and made publicly available to foster reproducibility.

Recommendation 23.1: PTI operations should update the DNSSEC Practice Statement (DPS) to allow the transition from one digital signature algorithm to another, including an anticipated transition from the RSA digital signature algorithm to other algorithms or to future post-quantum algorithms, which provide the same or greater security and preserve or improve the resilience of the DNS.

Recommendation 23.2: As a root DNSKEY algorithm rollover is a very complex and sensitive process, PTI operations should work with other root zone partners and the global community to develop a consensus plan for future root DNSKEY algorithm rollovers, taking into consideration the lessons learned from the first root KSK rollover in 2018.

Recommendation 24.1: ICANN org should coordinate end-to-end testing of the full EBERO process at predetermined intervals (at least annually) using a test plan that includes datasets used for testing, progression states, and deadlines, and is coordinated with the ICANN contracted parties in advance to ensure that all exception legs are exercised and publish the results.

Recommendation 24.2: ICANN org should make the Common Transition Process Manual easier to find by providing links on the EBERO website.

Appendix K: SSR2 Recommendation Pending Board Consideration

On 22 July 2021, the Board placed 34 SSR2 recommendations (3.1, 3.2, 3.3, 4.3, 5.3, 5.4, 6.1, 6.2, 7.1, 7.2, 7.3, 7.4, 7.5, 9.2, 9.3, 11.1, 12.1, 12.2, 12.3, 12.4, 13.1, 13.2, 14.2, 16.2, 16.3, 17.1, 18.1, 18.2, 18.3, 19.1, 19.2, 20.1, 20.2, 24.1) in pending status.

One recommendation (17.1) of the 34 SSR2 recommendations remains in pending status.

Recommendation 17.1: ICANN org should create a framework to characterize the nature and frequency of name collisions and resulting concerns. This framework should include metrics and mechanisms to measure the extent to which controlled interruption is successful in identifying and eliminating name collisions. This could be supported by a mechanism to enable protected disclosure of name collision instances. This framework should allow the appropriate handling of sensitive data and security threats.

Appendix L: Rejected SSR2 Recommendations

On 22 July 2021, the Board rejected 16 SSR2 recommendations (2.1, 2.2, 2.3, 2.4, 4.2, 8.1, 9.4, 10.2, 10.3, 14.1, 14.3, 14.4, 14.5, 15.1, 15.2, and 17.2).

On 1 May 2022, the Board rejected two SSR2 recommendations (19.1 and 19.2) it had placed in pending status on 22 July 2021.

On 16 November 2022, the Board rejected 12 SSR2 recommendations (3.1, 4.3, 6.1, 6.2, 7.4, 16.2, 16.3, 18.1, 18.2, 18.3, 20.1, and 20.2) it had placed in pending status on 22 July 2021.

On 10 September 2023, the Board rejected eight SSR2 recommendations (9.2, 9.3, 12.1, 12.2, 12.3, 12.4, 13.1, 14.2) it had placed in pending status on 22 July 2021.

Recommendation 2.1: ICANN org should create a position of a Chief Security Officer (CSO) or Chief Information Security Officer (CISO) at the Executive CSuite level of ICANN org and hire an appropriately qualified individual for that position and allocate a specific budget sufficient to execute this role's functions.

Recommendation 2.2: ICANN org should include as part of this role's description that this position will manage ICANN org's security function and oversee staff interactions in all relevant areas that impact security. This position should be responsible for providing regular reports to the ICANN Board and community on all SSR-related activities within ICANN org. Existing security functions should be restructured and moved organizationally to report to this new position.

Recommendation 2.3: ICANN org should include as part of this role's description that this position will be responsible for both strategic and tactical security and risk management. These areas of responsibility include being in charge of and strategically coordinating a centralized risk assessment function, business continuity (BC), and disaster recovery (DR) planning (see also SSR2 Recommendation 7: Improve Business Continuity and Disaster Recovery Processes and Procedures) across the internal security domain of the organization, including the ICANN Managed Root Server (IMRS, commonly known as L-Root), and coordinate with other stakeholders involved in the external global identifier system, as well as publishing a risk assessment methodology and approach.

Recommendation 2.4: ICANN org should include as part of this role's description that this role will be responsible for all security-relevant budget items and responsibilities and take part in all security-relevant contractual negotiations (e.g., registry and registrar agreements, supply chains for hardware and software, and associated service level agreements) undertaken by ICANN org, signing off on all security-related contractual terms.

Board Rationale for Rejecting Recommendations 2.1, 2.2, 2.3, 2.4: The Board notes that it has an oversight role; it is the responsibility of the ICANN President and CEO to structure ICANN org, and the President and CEO can only be held accountable to the management choices he structures and implements. It is not appropriate for the Board or a review team to curtail that authority or accountability.
The Board supports ICANN org's decision to distribute the various security functions to the relevant functional areas within the organization because of the diversity of the types of security challenges (internal systems, physical, staff safety, external to the continued function of the identifiers in which ICANN manages). These functional teams work closely

not only with one another but also with the Board [Risk Committee](#), which provides oversight as to the risk based functions for which ICANN org is responsible.

In addition ICANN org's Risk Management function is currently already assumed by a C-suite position, and org has put in place a CEO Risk Management Committee to oversee all risk management activities of the org, including the CEO and all C-Suite executives in charge of any security matters, whether DNS-related, cyber- and system- related and physical related. The CEO Risk Management Committee is therefore a mechanism that provides ICANN org with the overarching perspective and ability to centrally act on all security matters. It is not clear what issues the SSR2 Review Team intends the proposed C-Suite role and reorganization would address, or why the SSR2 Review Team believes that the creation of the C-Suite role and reorganizing structures that ICANN org intentionally distributed for efficiency and focus would have sufficient impact on those issues to justify the risk and disruption to staff and cost.

In light of the above considerations, the Board rejects Recommendations 2.1, 2.2, 2.3 and 2.4. However, the Board agrees with increased reporting and periodic communication of SSR activities. This is already partially performed as part of the current annual planning process but could be enhanced consistently with the presumed intent of the Recommendation 2.2.

Recommendation 3.1: The Executive C-Suite Security Officer (see SSR2 Recommendation 2: Create a C-Suite Position Responsible for Both Strategic and Tactical Security and Risk Management) should brief the community on behalf of ICANN org regarding ICANN org's SSR strategy, projects, and budget twice per year and update and publish budget overviews annually.

Board Rationale for Rejection: The Board rejects Recommendations 3.1, [...]. As the successful implementation of Recommendation 3.1 relies on Recommendation 2 that the Board rejected in July 2021, Recommendation 3.1 cannot be approved.

Recommendation 4.2: ICANN org should adopt and implement ISO 31000 "Risk Management" and validate its implementation with appropriate independent audits. ICANN org should make audit reports, potentially in redacted form, available to the community. Risk management efforts should feed into BC and DR plans and procedures (see SSR2 Recommendation 7: Improve Business Continuity and Disaster Recovery Processes and Procedures).

Board Rationale for Rejection: The Board notes that ICANN org has a strong, clearly documented risk management program, but not as envisioned by SSR2, as written. Thus, the Board agrees with the recommendation in principle, and considers the intent of the recommendation achieved through ICANN org's current operations. However, the Board cannot approve the portion of the recommendation that specifies that ICANN org "adopt and implement International Standardization Organization (ISO) 31000 'Risk Management' and validate its implementation with appropriate independent audits…" because it is not clear what risks would be mitigated , nor what benefit would be derived in expanding significant resources to switch from the current risk management process.

The Board supports ICANN org's risk management operations already in place. In light of the above considerations, and the fact that approval of the recommendation would require ICANN org to adopt and implement ISO 31000, while the Board agrees in principle with the intent of the recommendation, the Board rejects recommendation 4.2. The Board encourages ICANN org to continue following industry best practices and look for ways to strengthen its risk management practices as it evolves its operations as part of its continuous improvement.

Recommendation 4.3: ICANN org should name or appoint a dedicated, responsible person in charge of security risk management that will report to the C-Suite Security role (see SSR2 Recommendation 2: Create a C-Suite Position Responsible for Both Strategic and Tactical Security and Risk Management). This function should regularly update, and report on, a register of security risks and guide ICANN org's activities. Findings should feed into BC and DR plans and procedures (see SSR2 Recommendation 7: Improve Business Continuity and Disaster Recovery Processes and Procedures) and the Information Security Management System (ISMS) (see SSR2 Recommendation 6: Comply with Appropriate Information Security Management Systems and Security Certifications).

<u>Board Rationale for Rejection:</u> The Board rejects Recommendation 4.3 as its feasibility depends on Recommendation 2 which the Board rejected. The Board considers that security risks are already adequately considered, evaluated, managed, mitigated, both independently and in consideration of other risks, including the evaluation of the prioritization of resource allocation for mitigation actions. Moreover, existing reporting mechanisms allow for effective transparency and accountability of the management of all risks, not only security-related risks.
The Board notes that org has a Risk Management department as well as a Risk Management Framework which creates a holistic view of the most significant risks to the organization's mission, unifies risk management activities across the organization and provides assurance to Executive Management and the Board that the organization is operating safely in support of ICANN's mission. Additionally, ICANN org has a Board adopted Risk Appetite Statement which articulates the level of risk which ICANN org is willing to take and retain on a broad level to fulfil its mission. The Board also notes that the Committee of Sponsoring Organisations (COSO) framework applied by org for risk management activities is appropriate for ICANN's needs.

Recommendation 6.1: ICANN org should proactively promote the voluntary adoption of SSR best practices and objectives for vulnerability disclosure by the contracted parties. If voluntary measures prove insufficient to achieve the adoption of such best practices and objectives, ICANN org should implement the best practices and objectives in contracts, agreements, and MOUs.

<u>Board Rationale for Rejection:</u> The Board rejects Recommendation 6.1.
The Board notes and supports the continued efforts for all parties to adopt Best Common Practices (BCP).
While the Board agrees with the intent of this recommendation, the Board notes that the SSR2 Implementation Shepherds provided examples of certifications of standards bodies such as ISO/IEC 27001:2013 and/or ISO 22301:2012 in response to org's question. The Board cannot unilaterally impose such a requirement on the business practices of each registry. It would be outside of the Board's remit to require compliance to particular standards and standards bodies. Furthermore, the recommendation states that if BCPs are not voluntarily adopted by contracted parties, ICANN org should implement the BCPs and objectives in contracts, agreements, and Memorandums of Understandings (MOUs). This calls for work or outcomes that are outside of the Board's remit to direct, and are contingent on community work. Changes to contracted party agreements would be a matter of policy or a result of voluntary negotiations between ICANN org and contracted parties. The Board encourages ICANN org to pursue its continued promotion of initiatives that support and encourage voluntary adherence to current BCPs.

Recommendation 6.2: ICANN org should implement coordinated vulnerability disclosure reporting. Disclosures and information regarding SSR-related issues, such as breaches at any contracted party and in cases of critical vulnerabilities discovered and reported to ICANN org, should be communicated promptly to trusted and relevant parties (e.g., those

affected or required to fix the given issue). ICANN org should regularly report on vulnerabilities (at least annually), including anonymized metrics and using responsible disclosure.

Board Rationale for Rejection: The Board rejects Recommendation 6.2.
The Board agrees with the SSR2 Review Team on the importance of having a process in place for coordinated vulnerability disclosure reporting. ICANN org discloses major security vulnerabilities and resulting incidents that cause significant risk to the security of ICANN's systems, or to the rights and interests of data subjects, or otherwise require disclosure under applicable legal requirements. Any disclosures ICANN org may make in terms of an incident is based on ICANN org's own incident reporting process, including the Cybersecurity Transparency Guidelines as well as the Coordinated Vulnerability Disclosure Reporting Framework. ICANN org also maintains a Cybersecurity Incident Log at https://www.icann.org/cybersecurityincidentlog. ICANN org reviews and updates these Guidelines and Framework on an ongoing basis. Based on the SSR2 Implementation Shepherds' clarification on the intent of the recommendation, the Board finds that the existing framework is sufficient in meeting Recommendation 6.2 as it relates to vulnerabilities that would affect ICANN's systems.
With respect to a process for disclosures and information regarding SSR-related issues, such as "breaches at any contracted party" and reporting to "trusted and relevant parties," the Board notes that obligating such a disclosure process on contracted parties would require modifications to contracted party agreements. Such changes to contracted party agreements would be a matter of policy or a result of voluntary negotiations between ICANN org and contracted parties, and not something ICANN org or Board can unilaterally impose in agreements.

Recommendation 7.4: ICANN org should establish a new site for DR for all the systems owned by or under the ICANN org purview with the goal of replacing either the Los Angeles or Culpeper sites or adding a permanent third site. ICANN org should locate this site outside of the North American region and any United States territories. If ICANN org chooses to replace one of the existing sites, whichever site ICANN org replaces should not be closed until the organization has verified that the new site is fully operational and capable of handling DR of these systems for ICANN org.

Board Rationale for Rejection: [...] The Board rejects Recommendation 7.4. [...]
As it relates to Recommendation 7.4, the Board notes that the SSR2 Implementation Shepherds clarified that the scope of Recommendation 7.4 was strictly the key management facilities for the DNSSEC Root KSK, and that the main objective was to provide diversity of the jurisdiction of the facilities. The Board cannot justify the cost of building and maintaining an additional key management facility, knowing the level of required effort and constraints, as the possible benefit seems to be based on a perception that new non-U.S. physical construction would enhance diversity and address disaster recovery scenarios in a meaningful way.
For the reasons stated above, the Board is rejecting Recommendation 7.4.

Recommendation 8.1: ICANN org should commission a negotiating team that includes abuse and security experts not affiliated with or paid by contracted parties to represent the interests of non-contracted entities and work with ICANN org to renegotiate contracted party contracts in good faith, with public transparency, and with the objective of improving the SSR of the domain name system for end-users, businesses, and governments.

Board Rationale for Rejection: The Board notes that the aspect of the recommendation that calls for the introduction of a third party into the bilateral negotiation process is not proper or feasible. The Registry Agreement and Registrar Accreditation Agreement do not allow for

third-party beneficiaries. The Board notes that ICANN org negotiates in the broader interest of ICANN, including the public interest, and does not represent the interests of the domain industry. The Board also understands that parts of the ICANN community have concerns, as reflected through the public comments, about how Contracted Party agreements are negotiated, and acknowledges that it is important to listen carefully to the community as negotiations proceed and decisions are made. ICANN org also has an important enforcement role once items are incorporated into contracts.

The Board further notes that recommendation 8.1 is not allowed under the provisions of the RA and RAA. While the agreements do provide for a "Working Group", these have contractually specific meanings that are not aligned with this recommendation. For example, in the case of the RA, a "Working Group" is defined as: "representatives of the Applicable Registry Operators and other members of the community that the Registry Stakeholders Group appoints, from time to time, to serve as a working group to consult on amendments to the Applicable Registry Agreements (excluding bilateral amendments pursuant to Section 7.6(i)) Neither the Board or ICANN org is involved in the appointment of these contractual "Working Groups".

Further, the Board and ICANN org cannot bring about contractual changes unilaterally.

In light of the above considerations, the Board rejects this recommendation. The Board encourages ICANN org to continue bilateral discussions with the contracted parties in a way that enhances the security, stability, and resiliency of the DNS and to strive to have these bilateral discussions be transparent to the general public, in order to continue building trust.

Recommendation 9.2: ICANN org should proactively monitor and enforce registry and registrar contractual obligations to improve the accuracy of registration data. This monitoring and enforcement should include the validation of address fields and conducting periodic audits of the accuracy of registration data. ICANN org should focus their enforcement efforts on those registrars and registries that have been the subject of over 50 complaints or reports per year regarding their inclusion of inaccurate data to ICANN org.

Board Rationale for Rejection: The Board notes that ICANN org can pursue accuracy of registration data according to the provisions included in the Registry Agreement and Registrar Accreditation Agreement, and that at present extensive checks are conducted to verify the accuracy of registration data. The SSR2 recommendation seeks the enforcement of specific compliance requirements (i.e., address fields) regarding data accuracy that are not part of the current registry and registrar contractual framework. The recommendation calls for work or outcomes that would require the Board to unilaterally modify ICANN's agreements with registries and registrars, or would be contingent on community work. Changes to contracted party agreements would be a matter of policy or a result of voluntary negotiations between ICANN org and contracted parties.

The Board wishes to note the extensive provisions on data accuracy already in place in the current Registry and Registrar agreements, and ICANN Contractual Compliance actions that are independent from the number of yearly complaints.

The Board notes the SSR2 Implementation Shepherds' clarification that ICANN org should provide details of what Compliance does in this area, with supporting public documentation and summary results of audits, and that ICANN's Contractual Compliance reports are available at https://www.icann.org/resources/compliance-reporting-performance.

The Board also acknowledges that there are ongoing community discussions on registration data accuracy that may lead to the introduction of further data accuracy checks.

Recommendation 9.3: ICANN org should have compliance activities audited externally at least annually and publish the audit reports and ICANN org response to audit recommendations, including implementation plans.

Board Rationale for Rejection: The Board acknowledges that Recommendation 9.3 could have benefited from more clarity, as confirmed by SSR2 Implementation Shepherds. The Board appreciates the Recommendation's intent, as well as ICANN Compliance's continued commitment to transparency, including through publishing detailed metrics on its operations on a regular basis, and its commitment to continuous improvement through internal reviews to assess and improve on its operations.

The Board also acknowledges the Registry Stakeholder Group's views, as expressed in the public comment on the SSR2 Final Report, that any recommendations related to ICANN Contractual Compliance should be connected to specific contractual terms and tied to a specific problem statement. In addition, the Board notes the Registrar Stakeholder Group's comment that ICANN Contractual Compliance has resources in place to oversee and ensure consistent and accurate complaint processing. The Board recognizes that Compliance's objectives include fully and efficiently addressing third-party complaints, proactive enforcement of contractual obligations, and registry and registrar audits against their contractual obligations.

The Board recognizes ICANN org's assessment that the time and resources requested for running yearly, external audits will not lead to any desired improvement of procedures and processes that at present are running in accordance with the principles set in the contracted parties' agreements.

As a result, the Board rejects SSR2 Recommendation 9.3.

Recommendation 9.4: ICANN org should task the compliance function with publishing regular reports that enumerate tools they are missing that would help them support ICANN org as a whole to effectively use contractual levers to address security threats in the DNS, including measures that would require changes to the contracts.

Board Rationale for Rejection: The Board accepts in principle the idea of improving the tools that the ICANN org Contractual Compliance team has available to it in order to enforce policies that have been adopted by the community. However, the Board cannot approve the part of the recommendation that contemplates "measures that would require changes to the contracts" as such changes cannot be undertaken by either the Board or ICANN org unilaterally. As such, the Board rejects this recommendation given that it is not consistent with the role and authority of ICANN org's Contractual Compliance team. The Board encourages ICANN org's Contractual Compliance team to continue pursuing new tools that will help improve its work.

Recommendation 10.2: Establish a staff-supported, cross-community working group (CCWG) to establish a process for evolving the definitions of prohibited DNS abuse, at least once every two years, on a predictable schedule (e.g., every other January), that will not take more than 30 business days to complete. This group should involve stakeholders from consumer protection, operational cybersecurity, academic or independent cybersecurity research, law enforcement, and e-commerce.

Board Rationale for Rejection: The Board rejects Recommendation 10.2, as neither ICANN org nor Board can unilaterally establish a cross-community working group. However, the Board notes that the community continues its discussions over DNS security threat mitigation. Discussions include questions around the definitions and scope of DNS security threats that can be considered as coming within ICANN's remit and the extent to which policy or other community work may be required to supplement efforts already underway, such as industry-led initiatives. The Board is fully supportive of this effort and remains committed to this important work through facilitation and the convening of diverse relevant groups with diverse viewpoints.

Recommendation 10.3: Both the ICANN Board and ICANN org should use the consensus definitions consistently in public documents, contracts, review team implementation plans, and other activities, and have such uses reference this web page.

Board Rationale for Rejection: The Board rejects Recommendation 10.3 due to its dependencies on Recommendation 10.2; however, the Board supports using consensus definitions consistently.

Recommendation 12.1: ICANN org should create a DNS Abuse Analysis advisory team composed of independent experts (i.e., experts without financial conflicts of interest) to recommend an overhaul of the DNS Abuse Reporting activity with actionable data, validation, transparency, and independent reproducibility of analyses as its highest priorities.

Board Rationale for Rejection:The Board notes that the community continues its discussions over DNS abuse mitigation. The Board is fully supportive of this effort and remains committed to this important work through facilitation and the convening of diverse relevant groups with diverse viewpoints. Notably, the Domain Abuse Activity Reporting (DAAR) project is a system for studying and reporting on domain name registration and security threats across top-level domain (TLD) registries which was developed thanks to community input.
The Board notes the absence of issues that would justify an overhaul of DNS Abuse Reporting activity, as suggested by the SSR2, and rejects this recommendation. The Board encourages ICANN org to continue its work to evolve the DAAR initiative based on further community feedback.

Recommendation 12.2: ICANN org should structure its agreements with data providers to allow further sharing of the data for noncommercial use, specifically for validation or peer reviewed scientific research. This special no-fee non commercial licence to use the data may involve a time delay so as not to interfere with commercial revenue opportunities of the data provider. ICANN org should publish all data-sharing contract terms on the ICANN website. ICANN org should terminate any contracts that do not allow independent verification of methodology behind blocklisting.

Board Rationale for Rejection: The Board notes the value of the Domain Abuse Activity Reporting (DAAR) project and that the majority of data feeds used in the DAAR reports can be accessed freely and directly by the academic/non-commercial community without ICANN org serving as an intermediary.
The Board also notes that the recommendation's suggested approach of terminating contracts or requiring specialized licensing terms may result in negative consequences impacting the total number of data feeds ICANN org is allowed to access going forward and the corresponding quality of data utilized to generate DAAR reports.
Therefore, the Board rejects this recommendation.

Recommendation 12.3: ICANN org should publish reports that identify registries and registrars whose domains most contribute to abuse. ICANN org should include machine-readable formats of the data, in addition to the graphical data in current reports.

Board Rationale for Rejection: The Board supports ICANN org's assessment of this Recommendation, more precisely that the concept of abuse, as mentioned in the Recommendation language, goes beyond ICANN's remit, that careful considerations are required to distinguish between reported cases of DNS Abuse and evidenced cases of DNS Abuse, that prior engagement with the community could be helpful in designing a procedure that supports positive outcomes, and that the successful implementation and effectiveness

measures for this Recommendation imply additional actions. For those reasons, the Recommendation is rejected.

The Board encourages ICANN org to continue in its efforts to report security threat activity to the ICANN community, continue the dialogue with the contracted parties and support their actions in combating DNS Abuse, which may include publication of new reports and release of datasets that capture more specific aspects of the DNS Abuse landscape.

Recommendation 12.4: ICANN org should collate and publish reports of the actions that registries and registrars have taken, both voluntary and in response to legal obligations, to respond to complaints of illegal and/or malicious conduct based on applicable laws in connection with the use of the DNS.

Board Rationale for Rejecting: The Board notes that there are existing efforts within ICANN org as well as by third-parties to collect and provide some of the data similar to what the recommendation suggests. Recognizing that the recommendation requires changes to the contractual obligations, would create challenges for ICANN org, the registries, and registrars to define a reporting schema that would be globally applicable, and that the benefits and value of producing such reports are unclear, the Board rejects this recommendation.

Recommendation 13.1: ICANN org should establish and maintain a central DNS abuse complaint portal that automatically directs all abuse reports to relevant parties. The system would purely act as an inflow, with ICANN org collecting and processing only summary and metadata, including timestamps and types of complaint (categorical). Use of the system should become mandatory for all generic top-level domains (gTLDs); the participation of each country code top-level domain (ccTLD) would be voluntary. In addition, ICANN org should share abuse reports (e.g., via email) with all ccTLDs.

Board Rationale for Rejecting: The Board notes that this recommendation calls for ICANN's gTLD registries and accredited registrars to be required to use a centralized DNS abuse complaint portal. Such an obligation would necessitate a change to ICANN's current contracts with registries and registrars which the ICANN Board cannot unilaterally dictate. The Board also notes that ICANN org does not view a central abuse complaint processing system as an existing gap that it needs to fill in the marketplace and expend its resources upon at this time, and that per the ICANN org assessment, there is an existing tool that offers a service of centralized intake and distributing abuse reports. Therefore, the Board rejects this recommendation.

Recommendation 14.1: ICANN org should create a Temporary Specification that requires all contracted parties to keep the percentage of domains identified by the revised DNS Abuse Reporting (see SSR2 Recommendation 13.1) activity as abusive below a reasonable and published threshold.

Board Rationale for Rejecting: The Board notes that Temporary Policies can only be established by the Board upon specific requirements, such as when the Board "reasonably determines that such modifications or amendments are justified and that immediate temporary establishment of a specification or policy on the subject is necessary to maintain the stability or security of Registrar Services, Registry Services, the DNS or the Internet." The Board notes that Recommendation 14.1 does not provide such emergency grounds, and as such rejects this recommendation and the recommendations dependent on its implementation (14.3, 14.4, 14.5, 15.1 and 15.2).

Recommendation 14.2: To enable anti-abuse action, ICANN org should provide contracted parties with lists of domains in their portfolios identified as abusive, in accordance with SSR2

Recommendation 12.2 regarding independent review of data and methods for blocklisting domains.

Board Rationale for Rejecting: The Board notes that since January 2023, ICANN org has been actively engaged in a contract amendment process with the Registries and Registrars to add a clearly defined obligation to mitigate or disrupt DNS abuse.
Progress in this regard will support the evolution of ICANN Compliance's toolkit to appropriately respond to contracted parties' failures to address DNS Abuse. While the Board encourages ICANN org to continue to innovate and find ways to support the contracted parties in combating DNS Abuse, which may include reporting instances of well evidenced DNS Abuse to registrars and registries, the Board acknowledges the remit and roles of the different parts of the ICANN community.
However, as the language in SSR2 14.2 is not confined to DNS abuse, but rather to much more broadly defined forms of abuse, which may encompass forms of abuse that go beyond org's remit (as well as its visibility and competencies), the Board rejects this recommendation.

Recommendation 14.3: Should the number of domains linked to abusive activity reach the published threshold described in SSR2 Recommendation 14.1, ICANN org should investigate to confirm the veracity of the data and analysis, and then issue a notice to the relevant party.

Board Rationale for Rejecting: The Board notes that Temporary Policies can only be established by the Board upon specific requirements, such as when the Board "reasonably determines that such modifications or amendments are justified and that immediate temporary establishment of a specification or policy on the subject is necessary to maintain the stability or security of Registrar Services, Registry Services, the DNS or the Internet." The Board notes that Recommendation 14.1 does not provide such emergency grounds, and as such rejects this recommendation and the recommendations dependent on its implementation (14.3, 14.4, 14.5, 15.1 and 15.2).

Recommendation 14.4: ICANN org should provide contracted parties 30 days to reduce the fraction of abusive domains below the threshold or to demonstrate that ICANN org's conclusions or data are flawed. Should a contracted party fail to rectify for 60 days, ICANN Compliance should move to the deaccreditation process.

Board Rationale for Rejecting: The Board notes that Temporary Policies can only be established by the Board upon specific requirements, such as when the Board "reasonably determines that such modifications or amendments are justified and that immediate temporary establishment of a specification or policy on the subject is necessary to maintain the stability or security of Registrar Services, Registry Services, the DNS or the Internet." The Board notes that Recommendation 14.1 does not provide such emergency grounds, and as such rejects this recommendation and the recommendations dependent on its implementation (14.3, 14.4, 14.5, 15.1 and 15.2).

Recommendation 14.5: ICANN org should consider offering financial incentives: contracted parties with portfolios with less than a specific percentage of abusive domain names should receive a fee reduction on chargeable transactions up to an appropriate threshold.

Board Rationale for Rejecting: The Board notes that Temporary Policies can only be established by the Board upon specific requirements, such as when the Board "reasonably determines that such modifications or amendments are justified and that immediate temporary establishment of a specification or policy on the subject is necessary to maintain

the stability or security of Registrar Services, Registry Services, the DNS or the Internet."
The Board notes that Recommendation 14.1 does not provide such emergency grounds,
and as such rejects this recommendation and the recommendations dependent on its
implementation (14.3, 14.4, 14.5, 15.1 and 15.2).

Recommendation 15.1: After creating the Temporary Specification (see SSR2
Recommendation 14: Create a Temporary Specification for Evidence-based Security
Improvements), ICANN org should establish a staff-supported EPDP to create an anti-abuse
policy. The EPDP volunteers should represent the ICANN community, using the numbers
and distribution from the Temporary Specification for gTLD Registration Data EPDP team
charter as a template.

Board Rationale for Rejecting: [...] the Board notes that, while it can request an Issue Report
and Policy Development Process (PDP) be done by the Generic Names Supporting
Organization (GNSO), an Expedited Policy Development Process (EPDP) can only be
launched by a GNSO Council vote, and only in specific circumstances. The Board notes that
Recommendation 15.1 does not meet these requirements. The Board, consistent with its
action on the Competition, Consumer Trust, and Consumer Choice (CCT) Review Team
recommendations, will not take the place of the community within the multistakeholder model
and initiate a PDP upon a Specific Review team's recommendation. As such, even without
dependency on Recommendation 14.1, the Board would not be in a position to approve
Recommendations 15.1 and 15.2.

Recommendation 15.2: The EPDP should draw from the definition groundwork of the
CCWG proposed in SSR2 Recommendation 10.2. This policy framework should define
appropriate countermeasures and remediation actions for different types of abuse,
time-frames for contracted party actions like abuse report/response report timelines, and
ICANN Compliance enforcement actions in case of policy violations. ICANN org should insist
on the power to terminate contracts in the case of a pattern and practice of harboring abuse
by any contracted party. The outcome should include a mechanism to update benchmarks
and contractual obligations related to abuse every two years, using a process that will not
take more than 45 business days.

Board Rationale for Rejecting: [...] the Board notes that, while it can request an Issue Report
and Policy Development Process (PDP) be done by the Generic Names Supporting
Organization (GNSO), an Expedited Policy Development Process (EPDP) can only be
launched by a GNSO Council vote, and only in specific circumstances. The Board notes that
Recommendation 15.1 does not meet these requirements. The Board, consistent with its
action on the Competition, Consumer Trust, and Consumer Choice (CCT) Review Team
recommendations, will not take the place of the community within the multistakeholder model
and initiate a PDP upon a Specific Review team's recommendation. As such, even without
dependency on Recommendation 14.1, the Board would not be in a position to approve
Recommendations 15.1 and 15.2.

Recommendation 16.2: ICANN org should create specialized groups within the contract
compliance function that understand privacy requirements and principles (such as collection
limitation, data qualification, purpose specification, and security safeguards for disclosure)
and that can facilitate law enforcement needs under the RDS framework as that framework
is amended and adopted by the community (see also SSR2 Recommendation 11: Resolve
CZDS Data Access Problems).

Board Rationale for Rejecting: The Board rejects Recommendations 16.2 and 16.3.
The Board notes that the SSR2 Implementation Shepherds would like ICANN org to form
specialized groups within ICANN org's Contractual Compliance that understand privacy

requirements and principles, to provide legal expertise and support for law enforcement and consumer protection representatives during the evolution of the RDS framework. ICANN org's Contractual Compliance already has subject matter experts in multiple areas, including those enumerated by the SSR2 Implementation Shepherds, who contribute to policy development when requested by the ICANN community.

The Board notes that the SSR2 Implementation Shepherds' feedback indicates that these new groups under ICANN org's Contractual Compliance should require registrars to publish their privacy policies and procedures, and track them. ICANN org agreements with registries and registrars do not specifically require registrars to have "privacy policies."

The Board finds that Recommendation 16.2 is not within ICANN's scope and its contractual agreements with registries and registrars. It would be a matter of policy or a result of voluntary negotiations between ICANN org and contracted parties, and not something ICANN org or Board can unilaterally impose. [...]

Recommendation 16.3: ICANN org should conduct periodic audits of adherence to privacy policies implemented by registrars to ensure that they have procedures in place to address privacy breaches.

Board Rationale for Rejecting: The Board rejects Recommendations 16.2 and 16.3. The Board notes that the SSR2 Implementation Shepherds would like ICANN org to form specialized groups within ICANN org's Contractual Compliance that understand privacy requirements and principles, to provide legal expertise and support for law enforcement and consumer protection representatives during the evolution of the RDS framework. ICANN org's Contractual Compliance already has subject matter experts in multiple areas, including those enumerated by the SSR2 Implementation Shepherds, who contribute to policy development when requested by the ICANN community.

The Board notes that the SSR2 Implementation Shepherds' feedback indicates that these new groups under ICANN org's Contractual Compliance should require registrars to publish their privacy policies and procedures, and track them. ICANN org agreements with registries and registrars do not specifically require registrars to have "privacy policies."[...]

With respect to Recommendation 16.3, ICANN org's Contractual Compliance cannot carry out any audit on or enforce compliance with something that is not an ICANN contractual requirement.

Recommendation 17.2: The ICANN community should develop a clear policy for avoiding and handling new gTLD-related name collisions and implement this policy before the next round of gTLDs. ICANN org should ensure that the evaluation of this policy is undertaken by parties that have no financial interest in gTLD expansion.

Board Rationale for Rejecting: The Board rejects Recommendation 17.2, as the Board does not have the authority to develop policy. The Board notes that the community has already conducted extensive policy work concerning the process for handling name collisions for the next round of New Generic Top-Level Domains (new gTLDs), and the Security and Stability Advisory Committee (SSAC) Name Collision Analysis Project (NCAP) is another significant community effort already underway that is expected to result in additional useful information for the Board and community on the topic. Given the ongoing work in this area, including the NCAP studies, the Board understands that the results of those studies may have implications for SSR in the context of a future round of new gTLDs.

Recommendation 18.1: ICANN org should track developments in the peerreviewed research community, focusing on networking and security research conferences, including at least ACM CCS, ACM Internet Measurement Conference, Usenix Security, CCR, SIGCOMM, IEEE Symposium on Security and Privacy, as well as the operational security

conferences and FIRST, and publish a report for the ICANN community summarizing implications of publications that are relevant to ICANN org or contracted party behavior.

<u>Board Rationale for Rejecting</u>: The Board rejects Recommendations 18.1, 18.2 and 18.3. The Board considers that ICANN org is already taking appropriate measures to ensure that any emerging or evolving technology within ICANN's scope is evaluated appropriately and followed up on as needed.

The Board notes that there are organizations and research communities that already perform many of the actions as described in the recommendations. The Board determined that the benefits do not outweigh the costs for ICANN org to act as a proxy to the work of those organizations and communities. Much of the work within the academia and research communities are; a) conceptual or experimental, resulting in no real change to the protocols or technologies that ICANN has within its remit, and b) there is a significant amount of work being done unrelated to the DNS or other Internet unique identifiers that are within ICANN's remit.

The Board recognizes that ICANN org staff follow or participate in many operational and development forums, such as: Internet Engineering Task Force (IETF), Network Operators Groups (NOGs), Network Information Centers (NICs), the Registration Operations Workshop (ROW) and academic forums such as the Institute of Electrical and Electronics Engineers Technical Committee on Security and Privacy (IEEE S&P), and Advanced Computing Systems Association (USENIX) among others. Such forums are a place in which conceptual or experimental emerging or evolving technologies tend to appear when the concept has matured enough for realworld testing or evaluation prior to being implemented into new standards or technologies. When such a concept or technology rises to that level, ICANN org evaluates the technology relative to ICANN's mission and may take an action relative to the technology. Such actions may take the form of a publication (OCTO document, White Paper, Blog Post, etc), to be discussed within groups such as the SSAC, RSSAC, the Special Interest Forum on Technology (SIFT), or through inviting developers of these emerging or evolving technologies to present their work to the wider ICANN community through the Emerging Identifier Technology sessions at ICANN meetings.

The Board notes that there are other entities within the Internet community in which similar work takes place with no or very little barrier to entry. These other entities, such as IETF, International Telecommunication Union Standards Sector (ITU-T), World Wide Web Consortium (W3C), and others, perform similar actions as described above within their own remit. If such work overlaps with the ICANN mission, there are opportunities for collaboration between the respective groups to evaluate and work on emerging or evolving technologies. Finally, the Board wishes to highlight that the recommendations, as written, call for unbound work which is deemed as a critical element for their implementation. The list of places to monitor for these conceptual papers is exhaustive and beyond the list of the examples in the recommendation. ICANN org focuses its work on protocols and technologies that are implementable, have a potential impact on the ICANN ecosystem, and are within the narrow scope of the ICANN mission.

The Board supports the idea of continuing to follow such emerging or evolving technologies as described above and invites the community to raise awareness of any such technology or protocol that they feel ICANN org should pay particular interest.

Recommendation 18.2: ICANN org should ensure that these reports include relevant observations that may pertain to recommendations for actions, including changes to contracts with registries and registrars, that could mitigate, prevent, or remedy SSR harms to consumers and infrastructure identified in the peer reviewed literature.

<u>Board Rationale for Rejecting</u>: The Board rejects Recommendations 18.1, 18.2 and 18.3. The Board considers that ICANN org is already taking appropriate measures to ensure that

any emerging or evolving technology within ICANN's scope is evaluated appropriately and followed up on as needed.

The Board notes that there are organizations and research communities that already perform many of the actions as described in the recommendations. The Board determined that the benefits do not outweigh the costs for ICANN org to act as a proxy to the work of those organizations and communities. Much of the work within the academia and research communities are; a) conceptual or experimental, resulting in no real change to the protocols or technologies that ICANN has within its remit, and b) there is a significant amount of work being done unrelated to the DNS or other Internet unique identifiers that are within ICANN's remit.

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The Board supports the idea of continuing to follow such emerging or evolving technologies as described above and invites the community to raise awareness of any such technology or protocol that they feel ICANN org should pay particular interest.

Recommendation 18.3: ICANN org should ensure that these reports also include recommendations for additional studies to confirm peer reviewed findings, a description of what data would be required by the community to execute additional studies, and how ICANN org can offer to help broker access to such data, e.g., via the CZDS.

Board Rationale for Rejecting: The Board rejects Recommendations 18.1, 18.2 and 18.3. The Board considers that ICANN org is already taking appropriate measures to ensure that any emerging or evolving technology within ICANN's scope is evaluated appropriately and followed up on as needed.

The Board notes that there are organizations and research communities that already perform many of the actions as described in the recommendations. The Board determined that the benefits do not outweigh the costs for ICANN org to act as a proxy to the work of those organizations and communities. Much of the work within the academia and research

communities are; a) conceptual or experimental, resulting in no real change to the protocols or technologies that ICANN has within its remit, and b) there is a significant amount of work being done unrelated to the DNS or other Internet unique identifiers that are within ICANN's remit.

The Board recognizes that ICANN org staff follow or participate in many operational and development forums, such as: Internet Engineering Task Force (IETF), Network Operators Groups (NOGs), Network Information Centers (NICs), the Registration Operations Workshop (ROW) and academic forums such as the Institute of Electrical and Electronics Engineers Technical Committee on Security and Privacy (IEEE S&P), and Advanced Computing Systems Association (USENIX) among others. Such forums are a place in which conceptual or experimental emerging or evolving technologies tend to appear when the concept has matured enough for realworld testing or evaluation prior to being implemented into new standards or technologies. When such a concept or technology rises to that level, ICANN org evaluates the technology relative to ICANN's mission and may take an action relative to the technology. Such actions may take the form of a publication (OCTO document, White Paper, Blog Post, etc), to be discussed within groups such as the SSAC, RSSAC, the Special Interest Forum on Technology (SIFT), or through inviting developers of these emerging or evolving technologies to present their work to the wider ICANN community through the Emerging Identifier Technology sessions at ICANN meetings.

The Board notes that there are other entities within the Internet community in which similar work takes place with no or very little barrier to entry. These other entities, such as IETF, International Telecommunication Union Standards Sector (ITU-T), World Wide Web Consortium (W3C), and others, perform similar actions as described above within their own remit. If such work overlaps with the ICANN mission, there are opportunities for collaboration between the respective groups to evaluate and work on emerging or evolving technologies.

Finally, the Board wishes to highlight that the recommendations, as written, call for unbound work which is deemed as a critical element for their implementation. The list of places to monitor for these conceptual papers is exhaustive and beyond the list of the examples in the recommendation. ICANN org focuses its work on protocols and technologies that are implementable, have a potential impact on the ICANN ecosystem, and are within the narrow scope of the ICANN mission.

The Board supports the idea of continuing to follow such emerging or evolving technologies as described above and invites the community to raise awareness of any such technology or protocol that they feel ICANN org should pay particular interest.

Recommendation 19.1: ICANN org should complete the development of a suite for DNS resolver behavior testing.

Board Rationale for Rejecting: The Board rejects Recommendations 19.1 and 19.2 Upon first inspection, ICANN org determined that this recommendation was feasible to implement, thus it was put into the "Pending, likely to be approved" category. However, upon receipt of clarification of the scope of recommendation 19.1 to extend resources to maintain the existing ICANN testbed in perpetuity for public use, and broadening ICANN's testbed as recommended in 19.2, the implementation of functional testing of different configurations and software versions goes beyond ICANN's remit. The Board is in alignment with ICANN org's assessment that ICANN does not have a role in setting standards for DNS resolvers, and therefore rejects these recommendations that require ICANN to commit resources to continue or enhance existing resolver testbeds for public use. Additionally, the Board notes that even though these recommendations are being rejected, ICANN org does and will continue to build and use resolver testbeds, when appropriate to further ICANN's mission, and continue to assess aspects of DNS resolver behavior as it applies to ICANN org's remit.

Recommendation 19.2: ICANN org should ensure that the capability to continue to perform functional testing of different configurations and software versions is implemented and maintained.

Board Rationale for Rejecting: The Board rejects Recommendations 19.1 and 19.2 Upon first inspection, ICANN org determined that this recommendation was feasible to implement, thus it was put into the "Pending, likely to be approved" category. However, upon receipt of clarification of the scope of recommendation 19.1 to extend resources to maintain the existing ICANN testbed in perpetuity for public use, and broadening ICANN's testbed as recommended in 19.2, the implementation of functional testing of different configurations and software versions goes beyond ICANN's remit. The Board is in alignment with ICANN org's assessment that ICANN does not have a role in setting standards for DNS resolvers, and therefore rejects these recommendations that require ICANN to commit resources to continue or enhance existing resolver testbeds for public use. Additionally, the Board notes that even though these recommendations are being rejected, ICANN org does and will continue to build and use resolver testbeds, when appropriate to further ICANN's mission, and continue to assess aspects of DNS resolver behavior as it applies to ICANN org's remit.

Recommendation 20.1: ICANN org should establish a formal procedure, supported by a formal process modeling tool and language to specify the details of future key rollovers, including decision points, exception legs, the full controlflow, etc. Verification of the key rollover process should include posting the programmatic procedure (e.g., program, finite-state machine (FSM)) for public comment, and ICANN org should incorporate community feedback. The process should have empirically verifiable acceptance criteria at each stage, which should be fulfilled for the process to continue. This process should be reassessed at least as often as the rollover itself (i.e., the same periodicity) so that ICANN org can use the lessons learned to adjust the process.

Board Rationale for Rejecting: The Board rejects Recommendations 20.1 and 20.2. While the Board agrees with some elements of 20.1 and 20.2 (such as procedures and activities for future key rollovers), the Board does not have the option of selectively approving some parts and rejecting other parts of a single, indivisible community recommendation.
Recommendation 20.1 calls for ICANN org to pursue a novel model that cannot be implemented with existing resources and expertise. The Board notes that ICANN org had proposed an alternative process that would still contain evaluation checkpoints that allow circumstances to be assessed and provide for a potential course correction. The SSR2 Implementation Shepherds pointed to research done in the medical field, noting that it could be replicated in the DNSSEC Root Key management, but did not provide evidence of this approach having been researched or used in fields with direct applicability to the org's processes. The Board does not recommend developing such a complex and specific model based on speculative outcomes that were not researched in the DNSSEC Root Key Management.
The Board notes that rejecting Recommendation 20.1 impacts the feasibility of Recommendation 20.2.
The Board notes, however, that the FY23 IANA Operating Plan & Budget documents the org's commitment to initiate a study on algorithm rollovers. As of October 2022, ICANN org has commissioned an independent contractor to lead this research and they will work in close coordination with the community and ICANN org's DNSSEC experts. In addition, the FY24 IANA Operating Plan & Budget identified the next key rollover as one of its operating priorities.

Recommendation 20.2: ICANN org should create a group of stakeholders involving relevant personnel (from ICANN org or the community) to periodically run table-top exercises that follow the Root KSK rollover process.

Board Rationale for Rejecting: The Board rejects Recommendations 20.1 and 20.2. While the Board agrees with some elements of 20.1 and 20.2 (such as procedures and activities for future key rollovers), the Board does not have the option of selectively approving some parts and rejecting other parts of a single, indivisible community recommendation.

Recommendation 20.1 calls for ICANN org to pursue a novel model that cannot be implemented with existing resources and expertise. The Board notes that ICANN org had proposed an alternative process that would still contain evaluation checkpoints that allow circumstances to be assessed and provide for a potential course correction. The SSR2 Implementation Shepherds pointed to research done in the medical field, noting that it could be replicated in the DNSSEC Root Key management, but did not provide evidence of this approach having been researched or used in fields with direct applicability to the org's processes. The Board does not recommend developing such a complex and specific model based on speculative outcomes that were not researched in the DNSSEC Root Key Management.

The Board notes that rejecting Recommendation 20.1 impacts the feasibility of Recommendation 20.2.

The Board notes, however, that the FY23 IANA Operating Plan & Budget documents the org's commitment to initiate a study on algorithm rollovers. As of October 2022, ICANN org has commissioned an independent contractor to lead this research and they will work in close coordination with the community and ICANN org's DNSSEC experts. In addition, the FY24 IANA Operating Plan & Budget identified the next key rollover as one of its operating priorities.

Appendix M: Prioritization Process

In its Final Report submitted to the Board on 29 May 2020, the ATRT3 Review Team included "Recommendations, Suggestions, and Observations Related to the Prioritization and Rationalization of Activities, Policies, and Recommendations." The ATRT3's Recommendation 5, in part, echoed a conversation[33] started in 2019 between the ICANN Board and leadership of all Specific Review Teams on the need to enhance the effectiveness of review recommendations and their implementation, with a focus on resourcing and prioritization of community recommendations.

To address the need for prioritization, ICANN org launched the Planning Prioritization Framework project to serve as a guide for the step of prioritization during the annual planning process. As part of this project, ICANN org held a total of 17 webinars and consultations with the community from April 2021 through January 2022, and released a *Draft Planning Prioritization Framework Version 1* in February 2022 as a suggested tool to use in the planning process.

To test the processes and methodologies developed in the draft framework and identify gaps for further improvement, ICANN org organized a pilot with selected community members in April–May 2022. A set of Board approved Specific Reviews recommendations were the activities prioritized during the pilot. Given the timing of the pilot, the output of the pilot was used by org as input for the FY23 operating planning process.

The FY23 Pilot Prioritization consisted of a series of sessions facilitated by ICANN org's Planning team. The community group was invited to focus on recommendations eligible for prioritization[34] and to rate them using the "Urgency-Importance Matrix" technique. To assist the group, the repository of recommendations for prioritization included ICANN org guidance (proposed level with an associated rationale). ICANN org received the results of the FY23 Pilot Prioritization in the format of a list.

Following the conclusion of the pilot in early May 2022, ICANN org's Planning team released the *Planning Prioritization Framework Version 2* in August 2022 that includes feedback and lessons learned from the pilot.

The Planning Prioritization Framework was used during the prioritization effort in October–November 2022 to inform the FY24 Operating Plan and Budget cycle. Lessons learned from this cycle were reflected in version 3 of the Planning Prioritization Framework which the org released in March 2023.

The FY25 prioritization cycle was held in May-June 2023.

ICANN org is committed to including community prioritization in any future annual operating and financial planning cycles to inform decision-making for the annual and five-year planning process.

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[33] This dialogue, at the time, had led to a draft proposal titled Resourcing and Prioritization of Community Recommendations, which was shared with the community in October 2019.

[34] The prioritization effort did not include recommendations considered complete or tied to a dependency.

Appendix N: Cross-Functional Project Team on Implementation of Specific Reviews

To focus and strengthen the org's implementation work, ICANN org convened an internal cross-functional team of subject matter experts in June 2022, within a month of the FY23 Pilot Prioritization, to work through the recommendations in light of the priorities assigned by the community group during the pilot.

Using the priority list as input, the cross-functional project team completed an assessment of the resource requirements, to inform the need for use of the Supplemental Fund for Implementation of Community Recommendations (SFICR).

The SFICR serves to establish resources to "increase the capacity of the organization to address projects that are multi-year and focus on community recommendations (for policies or resulting from reviews and cross-community working groups) that are approved by the Board but do not fit within the annual Budget."

The cross-functional project team worked on establishing the implementation design and handbook. This entailed describing the implementation strategy, accompanying it with a rationale for the chosen path, articulating deliverables for implementation and associated Key Performance Indicators, running an inventory of existing work that can be leveraged, identifying stakeholders with interests and concerns, building out the work plan, as well as evaluating risks and dependencies that may affect the timeline. Furthermore, during this step, ICANN org evaluated possible dependencies among the prioritized recommendations and between the recommendations and other work or projects.

The final implementation handbook was then translated into a cross-functional work plan that forms the basis of this report.

The cross-functional project team is documenting implementation of recommendations marked complete and is monitoring, and resolving where/when appropriate and possible, dependencies to move Board-approved recommendations to prioritization.

On 16 November 2022, the Board took action to use SFICR funds toward the implementation of prioritized Specific Reviews recommendations. This Board resolution further support the cross-functional project team in its work.