Contribution on
Registration Data Request Service (RDRS) Policy Alignment Analysis
(Version of October 30, 2025)

1. Background

The ICANN Board seeks community input on the proposed roadmap for aligning the RDRS-related policy gaps identified in the paper and to help inform discussions between the ICANN Board and the Generic Names Supporting Organization (GNSO as they assess the work of the Privacy and Proxy Services Accreditation Issues (PPSAI) IRT and Registration Data Policy IRT and begin to discuss the consensus policy recommendations for a System for Standardized Access/Disclosure.[1]

2. Contribution

Our contribution reflects issues relating to children's rights and childhood. This is based on our experience and expertise with regard to the project, 'Child Protection and Children's Rights in the Digital World'[2]. We will not be reflecting issues of trademarks and other intellectual property rights.

Stiftung Digitale Chancen suggests the following enhancements for the RDRS or a successor system:
- Make participation mandatory for gTLD registrars,
- Make participation mandatory for ccTLD registrars,
- Make participation mandatory for registrar-affiliated privacy/proxy service providers,
- Development of an authentication/accreditation mechanism for LEA requests and
- Setting a response timeline for processing urgent requests.

In November 2023, ICANN made the online-based platform for querying registration data available for authorities and individuals with a given legitimate interest as an instrument to obtain information on non-public gTLD registration data via a standardised procedure. The service operates as an intermediary between those seeking information and the various registries. Thus such requests must only be addressed to one central point. This gives an important advantage to law enforcement authorities (LEA), for example, if they need to identify who operates a domain through which depictions of child sexual abuse (CSAM) are made accessible online. Previously necessary investigations to determine which registry is responsible for the respective domain can thus be completely eliminated in the future.

The extension of the term for another two years should be used to involve further registries as huge coverage is an essential prerequisite for the effective usage and impact of the RDRS. Also, it is necessary to develop an authentication/accreditation mechanism for LEA so that registrars can verify the legitimate interest of a single police department or any other law enforcement authority to request disclosure of non-public registration data. Likewise, it is essential to set a response timeline for the processing urgent requests. This timeline should reflect the urgency of the prevention of critical harm to life. Therefore, responses should be sent within few hours less than days.

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[1] https://www.icann.org/en/announcements/details/icann-board-seeks-input-on-rdrs-policy-alignment-analysis-30-10-2025-en
[2] https://www.childrens-rights.digital/

Stiftung Digitale Chancen acknowledges the ongoing process and engagement of all parties involved. We appreciate the commitment for the further development of the RDRS and encourage all ICANN bodies to strive for meaningful solutions.

3. About us

Since 2002, Stiftung Digitale Chancen (Digital Opportunities Foundation)[3] facilitates the dialogue among academia, industry, practitioners and politicians in order to analyse the sociopolitical consequences of digitisation and technological development with the purpose to develop and implement joint strategies for an inclusive transformation process of society providing equal opportunities for all.

The purpose of the Foundation is to promote science and research and education in the field of media usage and media literacy. We give effect to the Foundation's purpose through measures which promote media literacy and the safe and responsible use of digital media in all groups of society. Seeking to bridge the digital divide is an important priority.

The work of the Digital Opportunities Foundation focuses on the following core topics:
- Promoting digital and social participation
- Strengthening media literacy
- Promoting equal opportunities and access for all people to the Internet and digital services
- Researching the effects and social consequences of digitisation

The implementation of our Foundation's mission is tied to the realisation of equal opportunities, diversity, and variety as well as the support of innovation and sustainability. The Foundation takes into account the ethical implications of digitisation and the application of artificial intelligence. Our work is based on mutual respect and the fulfilment of our democratic responsibility.

The Foundation pursues charitable objectives within the meaning of the "tax-privileged purposes" section of the German Fiscal Code.

Berlin, December 5th 2025

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[3] https://www.digitale-chancen.de/en/