

Privacy & Proxy Services Accreditation Issues

Review of recommendations

September 2025

The [Privacy & Proxy Services Accreditation Issues \(PPSAI\) Working Group](#) was formed to address unresolved issues from the 2013 Registrar Accreditation Agreement (RAA) negotiations related to Privacy or Proxy services and the accreditation of providers of those services. The PPSAI Working Group 2015 [Final Report](#) offers recommendations defining Privacy and Proxy services, and outlining how and to under what circumstances those services should be offered.

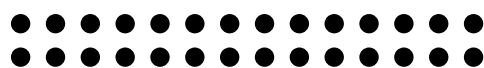
Timeline of PPSAI development:

- 2013: RAA introduces requirements
- 2015: PPSAI WG Final Report published
- 2016: ICANN Board adopts Recommendations
- 2019–2024: Implementation paused due to GDPR and EPDP on Registration Data conflicts
- 2025: Implementation Review Team (IRT) resumed its work; GNSO Council small team formed

PPSAI WG Recommendations that Registrars Already Follow:

- **Definitions** are essentially the same as in the [RAA](#)
 - **Privacy Service:** Domain is registered to the beneficial user, but alternate contact information is provided by the Privacy service in RDDS
 - **Proxy Service:** Proxy service provider becomes the Registered Name Holder and licenses the use of the domain to the customer, and the Registered Name Holder's contact information is displayed in the Registration Data Directory Service (RDDS) or equivalent services rather than the Customer's contact information.
- **Equal Treatment:** Both Privacy and Proxy services are treated equally for accreditation
- **Eligibility:** Anyone can use Privacy or Proxy services; registrant type (individual or organization) should not affect access to Privacy or Proxy services.
- **Registration Agreement:** Clear service terms must be provided, including conditions of service termination related to registrar transfer
- **Websites and Terms of Service** must include policies and procedures relating to publication and disclosure of customer data
- **Communication Relay:** Providers must relay communications to customers and handle persistent failures.
- **Domain Lifecycle Protections:**
 - Allow customers to transfer, renew, or restore domain names without obstruction.
 - Support renewals during the Redemption Grace Period under the Expired Registration Recovery Policy.
- **Abuse:** Providers must maintain a designated point of contact for abuse reports
- **Disclosure:** Privacy and Proxy service providers should use commercially reasonable efforts to avoid the need to disclose underlying customer data in the process of renewing, transferring or restoring a domain name.
- **LEA Disclosure Request:** Accredited Privacy and Proxy service providers should comply with express LEA requests not to notify customers, if required by applicable law.





Key Recommendations for Privacy & Proxy (P/P) Service Accreditation

PPSAI WG Recommendations that Registrars do not do:

- **Disclosure Framework:** Registrars follow the RAA and Registration Data Policy requirements for disclosure of underlying data. The PPSAI WG provided an alternative process for disclosure.
- **Relay Third-Party Requests:** Registrars follow internal processes for forwarding requests from third parties, considering local jurisdictional requirements as needed. The PPSAI WG recommended further standardization.
- **Verification Steps:** Privacy and Proxy customer data should have same validation/verification as Registrant data under the 2013 RAA.
- **Flag in RDDS/RDAP** - There should be an indicator that a domain is using Privacy or Proxy services. *(This may not be possible given current requirements for output format)*

PPSAI WG Recommendations only needed if Accreditation exists:

- **Accreditation List:** ICANN to maintain a list of accredited privacy and proxy service providers.
- **Non-Compliance:** A formal de-accreditation process for non-compliance would be needed.

