

# Issue Review: Urgent Requests for Lawful Disclosure of Nonpublic Registration Data

February 2026

- Registrars work hard to make sure Urgent disclosure requests are addressed swiftly and helpfully. We note with appreciation the GAC's efforts in helping to streamline the process by supporting the ability to authenticate LEA requestors
  - Urgent Requests requestors often need data registrars do not have, such as web hosting account holder information or forum subscriber information; in these cases, registrars help by redirecting the requestor to the appropriate place.
  - The RrSG has developed [ACIDTool.com](https://ACIDTool.com), an Abuse Contact Identifier, to help Internet users find web hosting and email providers for a given domain.
- Registrars respectfully request support from the GAC in facilitating interaction with diverse law enforcement requestors to ensure request quality meets requirements.
  - Because fulsome and accurate requests are often commingled with incomplete or even fraudulent requests, every request must be carefully reviewed for authenticity and appropriateness and to confirm it is indeed sent in by legitimate law enforcement.
  - If authenticated Urgent Requests LEA requestors always supply sufficient information for a registrar to take action, responses to their requests can be faster.
  - Jurisdiction matters; local requests can be actioned promptly and with minimal review while disclosure to foreign law enforcement is often subject to data transfer laws and other legal considerations.
- Details of the authentication mechanism must still be determined, including how the authentication happens and how it is required to be used. Registrars must be part of developing the process, including determining the parameters of its use.
  - The RrSG looks forward to understanding how an authentication mechanism would take into account the jurisdictional primacy that underpins the certainty, enforceability, and predictability inherent in the contracts and geopolitical realities of our industry, and how the GAC proposes to protect each registrar's discretion in making legal determinations when faced with a request from foreign jurisdictions.
- The RrSG is generally supportive of the GAC's proposal to track and publish aggregated metrics relating to disclosure request rates, response timing, etc.
  - Collecting these metrics may be complex, we look forward to discussing how best to achieve this

## Resources

- [ICANN Public Comment Process: Timeline for Urgent Requests for Lawful Disclosure of Nonpublic Registration Data](#)
  - [GAC Submission](#)
  - [RrSG Submission](#)
  - [Public Comment Summary Report](#)