

ICANN's Mission is clearly stated in the bylaws. In summary, and with respect to names, ICANN is responsible for developing and implementing policies relating to root zone assignments and second level registrations in gTLDs *for the purpose of ensuring the stable and secure operation of the Internet's unique identifiers*.¹ It is required to limit itself to issues requiring uniform/coordinated approach is reasonably necessary to facilitate the openness, interoperability, resilience, security and/or stability of the Internet and the DNS, and it must do so through bottom-up processes.² Certain things specified in the Annexes are – by definition – within ICANN's Mission – meaning that coordinate policy is reasonably necessary to ensure SSR. The referenced annexes specifically describe "*maintenance of and access to accurate and up-to-date information concerning domain name registrations*" as an example of the topics, issues, policies, procedures and principles referenced in Section 1.1(a)(i) of the Bylaws (*for the purpose of ensuring the stable and secure operation of the Internet's unique identifiers*).³ Further, the Annexes specifically reference policies regarding the "resolution of disputes regarding the registration of domain names (as opposed to the use of such domain names, but including where such policies take into account use of the domain names)."⁴ This purpose encompasses not only dispute resolution processes like the UDRP, but access to registration data by third parties for the purpose of dispute resolution.

The reference to access to accurate and up-to-date information concerning domain name registrations and resolution of disputes regarding registration has, since the beginning of ICANN time, included third party access to registration data in order for those third parties to protect their rights, protect consumers, etc. This assertion is reinforced by ICANN's Bylaws obligation to "adequately address issues of competition, consumer protection, security, stability and resiliency, malicious abuse issues, sovereignty concerns, and rights protection."⁵

¹ Section 1.1 Mission

(a) The mission of the Internet Corporation for Assigned Names and Numbers ("ICANN") is to ensure the stable and secure operation of the Internet's unique identifier systems as described in this Section 1.1(a) (the "**Mission**"). Specifically, ICANN:

(i) Coordinates the allocation and assignment of names in the root zone of the Domain Name System ("DNS") and coordinates the development and implementation of policies concerning the registration of second-level domain names in generic top-level domains ("gTLDs"). In this role, ICANN's scope is to coordinate the development and implementation of policies:

- For which uniform or coordinated resolution is reasonably necessary to facilitate the openness, interoperability, resilience, security and/or stability of the DNS including, with respect to gTLD registrars and registries, policies in the areas described in Annex G-1 and Annex G-2; and
- That are developed through a bottom-up consensus-based multistakeholder process and designed to ensure the stable and secure operation of the Internet's unique names systems.

The issues, policies, procedures, and principles addressed in Annex G-1 and Annex G-2 with respect to gTLD registrars and registries shall be deemed to be within ICANN's Mission.

² See bullet points above: The issues, policies, procedures, and principles addressed in Annex G-1 and Annex G-2 with respect to gTLD registrars and registries shall be deemed to be within ICANN's Mission.

³ See Bylaws Annex G-1 and G-2

⁴ Id.

⁵ Bylaws Section 4.6(d) CCT Review