DNS Abuse Mitigation

Sessions 7 and 15

Contents

Session Objectives - GAC Plenary Session (Agenda Item 15)

DNS Abuse is a priority issue for the GAC. Continuing on a program proposed since ICANN81 by the GAC co-leads for DNS Abuse (European Commission, Japan, and the United States), covering the 2024 global amendments to ICANN's Registry Agreement and Registrar Accreditation Agreement, which created obligations for domain name registries and registrars to mitigate or otherwise disrupt DNS Abuse, and taking into account discussion of narrowly scoped policy development processes s since ICANN82, during ICANN84 the GAC will discuss:

- The scope, timeline, next steps of policy development on DNS Abuse, and GAC participation in future GNSO Policy Development Process (PDP) on this matter;
- Potential topics for future work in the ICANN community, as previously identified by the GAC and as discussed in the Preliminary Issue Report on a DNS Abuse PDP, for future targeted policy development, contractual negotiations between ICANN and Contracted Parties, or non-binding efforts (e.g., sharing best practices) and cooperation between relevant stakeholders.

Session Objectives - Pre-PDP Working Session (Agenda Item 7)

The GNSO Council requested an Issue Report on DNS Abuse in August 2025 and in doing so, suggested three priority topics that should be included in the PDP on DNS Abuse that is expected to follow the completion of the Final Issue Report.

In this GNSO-hosted community session, the goal is to begin preparations for the anticipated PDP by discussing the priority topics, and for each, gaining an initial understanding of the various goals and interests across the community as well as an understanding of what a satisfactory outcome could be. This preparatory work is expected to provide the eventual PDP on DNS Abuse with a starting basis to conduct its deliberations. The expected agenda of this session is appended to this briefing.

Leadership Proposal for GAC Action

1. **Consider GAC and community input on the proposals regarding future DNS Abuse policy development** in response to the public comment proceeding on the Preliminary Issue Report on a DNS Abuse PDP (8 September 2025), and particularly GAC Comments (18 October 2025) with regards to:

    - **Process and timeline to achieve enforceable obligations** on all gTLDs before the next round of New gTLDs on the two issues identified for immediate policy development:
        - **Unrestricted Application Programming Interface (API) access for high-volume registrations** (also referred in previous community discussions as "bulk domain registrations");
        - **Associated Domain Checks** (duty for registrars to proactively investigate other domains registered by a particular registrant or account when abuse is identified on one of their domains);
    - **Possible paths to address the remaining issues** (or "gaps") included in the Preliminary Issue Report but not currently prioritized for immediate policy development, and which remain GAC priorities, such as:
        - **Proactive monitoring as part of preventative measures** (see gaps "P6. Challenges in Real time Detection of Short Lived Abuse" p.15 of the Preliminary Issue Report, and "P7. Underuse of Predictive Algorithms for Early Detection" p.16);
        - **Addressing registration data accuracy** (see gaps "P2 and P3:Lack of proactive/Timely contact verification" which recall the recommendation of the GNSO Small Team on accuracy of registration data; and "P8. No Post-Registration Identity Checks for Suspicious Activity);
        - **Increased transparency in the reporting obligations** (see gap "C1. Limited Transparency in Mitigation Actions" p.23);
        - **Consensus policy on subdomain abuse** (see gap C4 "Unregulated subdomain abuse" p.26)
        - **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 "Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks" p. 32)

2. **Discuss GAC participation in GNSO policy development expected on DNS Abuse** consistent with the proposed PDP Working Group charter attached to the Preliminary Issue Report on a DNS Abuse PDP (8 September 2025):

    - Consider participating in a dedicated GAC Small Group on DNS Abuse to support the GAC representatives in the PDP Working Group, following the proven GAC Small Group model implemented to support policy work on Registration Data since 2018
    - Consider becoming an observer of a future DNS Abuse PDP as an individual GAC participant

3. **Consider ICANN's reported progress in the enforcement of DNS Abuse mitigation contractual requirements** as reported during an ICANN84 Prep Week Session and a follow-up blog publication (20 October 2025).

Current Status and Recent Developments

- **Policy development regarding the prevention and mitigation of DNS Abuse**
    - Per the ICANN69 GAC Communiqué (23 October 2020), "***From the GAC's perspective, the momentum has been increasingly building for concrete action*** *as the Community has progressively engaged in constructive dialogue to advance work on a shared goal, the mitigation of DNS abuse. Beginning with the recommendations from the CCT-RT and the SSR2 RT and continuing through several cross-community sessions and more recent work on a DNS Abuse Framework,* ***the GAC believes there is now a solid expression of broad support for concrete steps to be taken to address the core components of effective DNS abuse mitigation****".*
    - On 31 January 2022 the GNSO Council formed a **GNSO Small Team on DNS Abuse** expected to determine "*what policy efforts, if any, the GNSO Council should consider undertaking to support the efforts already underway in the different parts of the community to tackle DNS abuse*".
    - In The Hague Communiqué (20 June 2022), the GAC stated that "***any PDP on DNS Abuse should be narrowly tailored to produce a timely and workable outcome***" to which the ICANN Board responded that it shares this view and is prepared to support the ICANN community in such pursuits[1].
    - **The GNSO Small Team recommended** in a Report to the GNSO Council (7 October 2022): **the initiation of a tightly scoped policy development on malicious registrations** (Rec. 1), **further exploration of the role of bulk registrations play in DNS Abuse** and measures already in place to address it (Rec. 2), **encouraging further work towards easier, better and actionable reporting** of DNS Abuse (Rec. 3), and possible work between Contracted Parties and ICANN Compliance regarding its findings on potential gaps in interpretation and/or enforcement of the current ICANN contracts (Rec. 4). The GNSO Council proceeded with recommended outreach to Contracted Parties regarding Rec. 3 and to Contracted Parties, the DNS Abuse Institute and ICANN Compliance regarding Recommendation 2 (6 January 2023).
    - **Regarding bulk registrations**, the ICANN Compliance response to the GNSO Council (22 February 2023) states that '*ICANN agreements and policies do not contain requirements or limitations related to registering domain names in bulk. As a result,* ***ICANN Contractual Compliance does not collect or track information on bulk registrations****, [or] the potential role these may play in Domain Name System (DNS) abuse".*
    - Based on further input received from Contracted Parties[2], **the GNSO Small Team on DNS Abuse concluded**, as part of its Preliminary Findings Preliminary Finding on Bulk Registrations (15 May 2023), that **the topic of bulk registrations "*does not fall within the realm of Consensus Policy at the moment*"** to the extent that:

[1] See https://gac.icann.org/sessions/boardgac-interaction-group-bgig-call-31-august-2022 (31 August 2022) [*prior GAC website login required*]

[2] See correspondence from the Contracted Parties House (CPH), Registry Stakeholder Group (RySG) and Registrar Stakeholder Group (RrSG)

- *Complaints from single or multiple registrations are handled uniformly, without clarity on what might constitute bulk registrations warranting targeted reactions.*
- *The lack of a clear definition did not elicit a clear response.*
- *Other Know Your Customer tools are deemed more efficient in detecting potential abuse, and should warrant more attention.*
- *ICANN's recently started Inferential Analysis of Maliciously Registered Domains (INFERMAL) project seems to indicate a willingness from the org. to look into this matter and provide [...] better statistics and intelligence* [on this matter]

- The GAC's statement in the GAC Comments (17 July 2023) on the proposed Amendments that "*subsequent work with the multistakeholder community on DNS Abuse [...] should include Policy Development Processes (PDPs) to further inform the updated RA and RAA, as well as other work on outstanding issues to address prior to the next application round for New gTLDs." and* the summary report of Public Comments on the new amendments (1 August 2023) in which ICANN org noted "*the ICANN community will have the opportunity to discuss these obligations and determine if further obligations are required […]. **ICANN org and the CPH NT support the comments from the GAC which stated that after the proposed amendments are adopted, work should include Policy Development Processes (PDPs) to further inform the updated Base RA and RAA**."*
- **The ICANN Board's indication**, during a GAC/Board interaction on the ICANN79 San Juan Communqué (13 May 2024)[3] that while Compliance reports are expected to contribute to measuring the impact of the DNS Abuse Amendments, **it would be up to a community-led effort, facilitated and supported by ICANN, to determine the specific metrics and data sets that will allow measurement** of such an impact. In response to Issues of Importance in the ICANN80 Kigali Communiqué (15 October 2024), the ICANN Board further stated that "*It is important to allow sufficient time for the implementation of the new amendments and to accurately measure impact. For example, **Compliance metrics, while an important data source, alone cannot be relied on to measure the overall impact of the DNS Abuse Amendments**. Compliance has visibility over the instances of DNS Abuse that are subject of Compliance's cases, but not over the entire DNS market and how contracted parties or other actors within the DNS ecosystem address DNS Abuse*".
- On 15 May 2025, the GNSO Small Team on DNS Abuse **was reconvened following the GNSO Council revisiting the topic of DNS as a potential area for future policy work** in light of contract amendments between ICANN and contracted parties now in effect and related data from ICANN Compliance being available. The Assignment (29 April 2025) of the reconvened GNSO Small Team includes:
  - Evaluating DNS Abuse mitigation efforts across ICANN including potential outreach to the broader ICANN community to seek input on suitable areas for policy development
  - Assessing the impact of the Contract amendments on DNS abuse mitigation efforts;

[3] See ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué (9 May 2024)

- Discussing with relevant stakeholders and providing a summary on the insights from the INFERMAL study and how these insights can help inform next steps on DNS Abuse;
- Recommending the GNSO Council potential next steps (policy, further research, community/industry collaboration etc.) that may be needed to address DNS Abuse.

- **The INFERMAL project**'s Final Report (8 November 2024), which conducted analysis of maliciously registered domains, was highlighted in the GAC Istanbul Communiqué (18 November 2024), presented to the ICANN Community in a Pre-ICANN82 webinar (19 February 2025) and discussed between the GAC, ALAC, SSAC, GNSO and in GAC plenary during ICANN82 (see ICANN82 GAC Meeting Minutes).
- **The NetBeacon Proposals for PDPs on DNS Abuse**, published in the form of a White Paper (21 May 2025) which offers 5 topics for "*tightly scoped PDPs*" that are "*designed to address a discrete problem without creating undue complexity or overreach*":
  - **Associated Domain Check**: A reactive approach requiring registrars to investigate domains linked to malicious actors, particularly in cases of bulk domain registrations used for abuse campaigns.
  - **Friction in Bulk Registrations for New Customers**: A proactive approach that seeks to introduce friction for new customer accounts, prior to gaining access to high volume registration tools (i.e., API access for new customers), until trust is established.
  - **Subdomain DNS Abuse**: A proposal to help address the growing abuse of subdomain services by codifying the responsibilities of registrants who offer them, via requirements in registrar and registry terms of service.
  - **Registrant Recourse Mechanisms**: A measure that ensures registrants have a path to challenge enforcement actions of registrars or registries when taken in error.
  - **Centralized Coordination on DGA Malware and Botnets**: A proposal to have ICANN serve as a coordination hub for law enforcement and national CERTs in cases involving DGA-based malware and botnets, enabling more efficient, synchronized mitigation.
- In the ICANN83 GAC Prague Communiqué (16 June 2025), **the GAC advised the ICANN Board to "*urge the GNSO Council* to undertake all necessary preparations prior to ICANN84 towards starting *targeted and narrowly scoped Policy Development Processes (PDPs) on DNS Abuse issues*, prioritizing bulk registration of malicious domain names and the responsibility of registrars to investigate domains associated with registrant accounts that are the subject of actionable reports of DNS Abuse.*"**
- In the ICANN Board Action (14 Sept. 2025) **in response to the ICANN83 GAC Advice, the ICANN Board noted the GNSO Council's request for an Issue Report** from ICANN org on DNS Abuse[4], as had been recommended by the GNSO Small Team on DNS Abuse (31 July 2025), and **stressed that this Issue Report "*is a critical milestone in the process to launch a PDP*, *and will include an exploration of the three policy enhancements highlighted by***

[4] On 14 August 2025, the GNSO Council resolved, as part of resolution 20250814-1 that "*The GNSO Council accepts the recommendations as outlined in the DNS Abuse Small Team report and requests that an Issue Report be initiated on the topics as outlined by the Small Team and requests that Staff create the report.*". See also p.3 of the vote results on this resolution.

the GAC as priority items, as well as additional items discussed in the small team's report, and a proposal for a narrowly chartered PDP(s) that can be completed swiftly."

- Prior to ICANN84, and in response to the ICANN Public Comment proceeding on the Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation (8 Sept. 2025), the GAC Comments (18 Oct. 2025) highlighting the need for:
  - **Process and timeline clarifications to achieve enforceable obligations** on all gTLDs before the next round of New gTLDs on the two issues identified for immediate policy development:
    - **Unrestricted Application Programming Interface (API) access for high-volume registrations** (also referred in previous community discussions as "bulk domain registrations")
    - **Associated Domain Checks** (duty for registrars to proactively investigate other domains registered by a particular registrant or account when abuse is identified on one of their domains)
  - **Clarification of possible paths to address the remaining issues** (or "gaps") included in the Preliminary Issue Report but not currently prioritized for immediate policy development, and which remain GAC priorities, such as:
    - **Proactive monitoring as part of preventative measures** (see gaps "P6. Challenges in Real time Detection of Short Lived Abuse" p.15 of the Preliminary Issue Report, and "P7. Underuse of Predictive Algorithms for Early Detection" p.16);
    - **Addressing registration data accuracy** (see gaps "P2 and P3:Lack of proactive/Timely contact verification" which recall the recommendation of the GNSO Small Team on accuracy of registration data; and "P8. No Post-Registration Identity Checks for Suspicious Activity);
    - **Increased transparency in the reporting obligations** (see gap "C1. Limited Transparency in Mitigation Actions" p.23).
    - **Consensus policy on subdomain abuse** (see gap C4 "Unregulated subdomain abuse" p.26)
    - **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 "Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks" p. 32)
- Community input in 27 contributions on the Preliminary Issue Report on DNS Abuse Mitigation is expected to inform **preparation of the Final Issue Report by ICANN org**, which the GNSO Council will consider in determining next steps, including initiation of a PDP.
  In the ICANN Board Action (14 Sept. 2025) in response to the ICANN83 GAC Advice, the ICANN Board stressed that "*The Bylaws-mandated step to develop the Issue Report is in place to ensure that a PDP is appropriately scoped within ICANN's Mission and the policy issues are well defined.* ***While this means that a PDP will not be finally initiated by ICANN84, the Board appreciates the commitment from the community and ICANN staff***

***to establish the foundation to initiate the PDP as expeditiously as possible**, presuming the Council determines a PDP is warranted*"

- **Amendments of the Registry and Registrar Agreements to Enhance DNS Abuse Mitigation Obligations**
    - In the ICANN76 Cancún Communiqué (20 March 2023), the GAC encouraged the ongoing negotiations *"to proceed expeditiously"* and noted that it *"considers that **continued efforts in this area will be required, including further improvement of contractual obligations and/or targeted policy development processes prior to the launch of a second round of New generic Top-Level Domains** (new gTLDs)."* In addition, the GAC encouraged *"Contracted Parties and ICANN to further consider, inter alia, proactive measures as well as positive incentives for registries and registrars in future work on DNS abuse mitigation or disruption."*
    - In preparation for ICANN77, the **GAC Underserved Regions Working Group** (USRWG) organized two **webinars** to prepare newcomers and underserved regions GAC representatives to contribute to a Comment on the expected amendments of the Registry and Registrar contracts[5].
    - **ICANN org initiated a public comment proceeding** on the Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations (29 May 2023) which were subsequently presented in a ICANN77 Prep Week webinar (30 May 2023). Among the various changes proposed to ICANN's contracts, the amendments include a **new requirement to promptly take appropriate mitigation actions against domains for which the contracted party has actionable evidence** demonstrating that the domains are being used for DNS Abuse. In addition to the proposed contract amendments, a draft ICANN Advisory provides detailed explanation of the new provisions and sets expectations as to their interpretation.
    - Following its discussions of the proposed amendments during ICANN77[6], GAC Comments (17 July 2023) were submitted in the public comment proceeding:
        - The GAC noted that the amendments are "*timely and relevant and, when adopted, will represent an important first step forward to combat DNS Abuse.*"
        - The GAC stressed "*In light of the ongoing threat that DNS Abuse poses to consumers and the public and private sectors*", that "*it is imperative that the improved contracts are swiftly adopted following the completion of the Public Comment process*"
        - **The GAC expressed support for "*the proposed amendments as a general matter*" but invited *"ICANN org and the CPH NT to consider some specific issues related to the text of the amendments*"**. These include: the DNS Abuse definition; reporting and monitoring by Contracted Parties; consequence for non compliance; providing the ICANN community the ability to monitor how compliance is enforced; the need for the Advisory to be updated from time to time; and the need to address DNS Abuse both inside and outside of ICANN.
        - **The GAC indicated looking forward to "*engaging in subsequent work* with the**

[5] See Pre-ICANN77 GAC Capacity Development Webinar on DNS abuse #1 (4 May 2023) and Webinar #2 (22 May 2023)
[6] See ICANN77 GAC Capacity Development Workshop on DNS Abuse (Sunday 11 June) and GAC Discussion on DNS Abuse (Wednesday 14 June)

*multistakeholder community on DNS Abuse after the amendments are adopted. T**his work should include Policy Development Processes (PDPs) to further inform the updated RA and RAA, as well as other work on outstanding issues** to address prior to the next application round for New gTLDs."*

- In its Public Comment Summary Report (1 August 2023), **ICANN org indicated that voting by registries and registrars will proceed on the amendments as initially proposed** and noted *"[r]regarding comments that the proposed amendments are insufficient to address the challenge of DNS Abuse": ICANN org acknowledges the comments and reminds the community that the ICANN community will have the opportunity to discuss these obligations and determine if further obligations are required […]. I**CANN org and the CPH [Negotiating Team] support the comments from the GAC which stated that after the proposed amendments are adopted, work should include Policy Development Processes (PDPs) to further inform the updated Base RA and RAA**."*
- Voting by registries and registrars on the amendments started on 9 October 2023 for a duration of 60 days and concluded successfully with 80% of affirmative votes by Registries and 94% approval by Registrars[7] .
- The ICANN Board subsequently resolved to approve the amendments (21 January 2024) and determined that "***no further revisions to the proposed Global Amendments are necessary after taking the public comments** and voting results into account".*
- The Amendment of the Registry Agreement, the Amendment of the Registrar Accreditation Agreement and the related Advisory: Compliance With DNS Abuse Obligations in the Registrar Accreditation Agreement and the Registry Agreement were published on 5 February 2024 and became effective on 5 April 2024[8].
- In the ICANN79 GAC San Juan Communiqué (11 March 2024), the GAC stated that it *"will track reports from ICANN Compliance on DNS Abuse enforcement"* and that "*there remains a general expectation that significant progress occur in advance of the next round of new gTLD applications"*.
- In its ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué (9 May 2024) regarding the ICANN79 Communiqué, the ICANN Board stated: "***the intent is that Compliance's reports contribute to measuring the impact of the DNS Abuse Amendments**. However, **determining the specific metrics and data sets that will allow measurement of such an impact should be a community-led effort, facilitated and supported by ICANN**"*. It further indicated that "*an ICANN org cross-functional team working on analyzing the information and determining how to approach these efforts.*"
- During the GAC and ICANN Board discussion (21 October 2024) of the Issues of Importance identified in the ICANN80 Kigali Communiqué (17 June 2024), the ICANN Board stressed that the new amendments "*empower ICANN Contractual Compliance*

[7] Detailed voting results available at https://www.icann.org/resources/pages/global-amendment-2024-en
[8] See notices sent by ICANN org to Registry Operators and Registrars (5 Feb. 2024)

(Compliance) to take enforcement actions against registrars or registries who fail to adequately mitigate or disrupt well evidenced DNS abuse"

- As it relates to measuring the **impact and effectiveness of the new DNS Abuse amendments**, the ICANN Board stated "*It is important to allow sufficient time for the implementation of the new amendments and to accurately measure impact. For example, **Compliance metrics, while an important data source, alone cannot be relied on to measure the overall impact of the DNS Abuse Amendments**. Compliance has visibility over the instances of DNS Abuse that are subject of Compliance's cases, but not over the entire DNS market and how contracted parties or other actors within the DNS ecosystem address DNS Abuse. Accordingly, **Compliance data can be considered alongside that of other third-party experts who also capture nuanced metrics**. For instance Net Beacon's MAP contains metrics across the global gTLD domain name market such as normalized abuse rates, median time to mitigate, and viewpoint of malicious versus compromised names*."
- **ICANN Contractual Compliance** provided an update on the first year of enforcing the DNS Abuse mitigation obligations (23 April 2025) and will be providing an update on its enforcement efforts during the ICANN84 Prep Week (13-15 October 2025).

- **Specific Reviews recommendations related to DNS Abuse**[9]

    - **The SSR2 Review delivered 63 recommendations** in its Final Report (25 January 2021) with a significant focus on measures to prevent and mitigate DNS Abuse.
        - The GAC considered a Draft SSR2 Review Report (24 January 2020) and endorsed many of the draft recommendations in a GAC Comment (3 April 2020). These were followed by GAC Comments (8 April 2021) on the final recommendations, and subsequent GAC Advice in the ICANN72 Communiqué (1 Nov. 2021) requesting follow-up action and further information on levels of implementation of certain recommendations, to which the ICANN Board responded (16 Jan. 2022), leading to further discussions during ICANN73[10], and communications by ICANN org to the GAC in a letter (18 March 2022) and a follow-up email (12 April 2022).
        - Based on the ICANN Specific Review Quarterly Report (31 March 2024), and based on several ICANN Board resolutions (22 July 2021, 1 May 2022, 16 November 2022 and 10 September 2023): **23 recommendations** are now **approved** (including 14 subject to prioritization for implementation), **38 rejected**, and **1 pending** further information.
        - On 10 September 2023, the **ICANN Board rejected 6 of the 7 Pending Recommendations relating to DNS Abuse** based on assessment by ICANN org - **12.1** (*DNS Abuse Analysis advisory team*), **12.2** (*structure agreements with data providers to allow further sharing of the data*), **12.3** (*publish reports that identify registries and registrars whose domains most contribute to abuse*), **12.4** (*report actions taken by registries and registrars to respond to complaints of illegal and/or malicious conduct*), **13.1** (*central DNS abuse complaint portal mandatory for all gTLDs*), **13.2** (*publish complaints data for third party analysis*) and **14.2** (*provide contracted parties with lists of domains in their portfolios identified as abusive*)
        - **In its discussion of contract negotiations on DNS Abuse, the GAC PSWG discussed**[11] **several SSR2 recommendations that have been rejected** by the ICANN Board per the Board Scorecard (22 July 2021) - **8.1** (*commission a negotiating team that includes abuse and security experts to renegotiate contracted party contracts*), **9.4** (*regular compliance reports enumerating missing tools*), **14.4** (*provide contracted parties 30 days to reduce the fraction of abusive domains below the threshold*) and **14.5** (*consider offering financial incentives*) - **for which the GAC acknowledged** in the GAC ICANN72 Communiqué (1 November 2021) "*the procedural bases for the Board's rejection*" **noting**, nevertheless, ***"the useful substantive aspects of certain rejected recommendations**, including those that aim **to provide ICANN org and ICANN Contractual Compliance with appropriate tools to prevent and mitigate DNS abuse***".

[9] The status of all recommendations may be consulted in the ICANN's Quarterly Reports, the home page of each review, all accessible from https://www.icann.org/resources/reviews/specific-reviews

[10] See ICANN73 GAC Minutes p.13

[11] See PSWG Conference Call on 14 February 2023 [*prior GAC website login required*]

- The **Competition, Consumer Trust & Consumer Choice Review Team's** Final Report (8 Sep. 2018) provided 35 recommendations. In the Montréal Communiqué (6 Nov. 2019), as clarified in subsequent correspondence with the ICANN Board (Jan. 2020), **the GAC advised the ICANN Board "*not to proceed with a new round of gTLDs until after the complete implementation* of the recommendations [...] that were identified as 'prerequisites' [14 recommendations] or as 'high priority' [10 recommendations]."** Following discussions related to the ICANN70 and ICANN71 Communiqués[12], the GAC and ICANN Board agreed on an understanding stated in a GAC/Board BGIG Call (5 October 2021) *[GAC Website Login required]* as "*the GAC would consider follow-up on the substance of the CCT Review recommendations and not the specific recommendations themselves.*"
  Several of the these recommendations were relevant to contract negotiations on DNS Abuse and were discussed by the GAC PSWG[13]:
  - **Recommendation 17** (*collect data about and publicize the chain of parties responsible for domain name registrations)* **was approved and implementation is complete** per its Implementation documentation as of 14 Sep. 2022.
  - **Recommendation 13** (*collect data on impact of registration restrictions* which the GAC noted "*would allow for more informed decision and policy making with regard to future standard registry and registrar contract provisions")* and **Recommendation 20** (*assess mechanisms to report and handle complaints and possibly consider amending future standard Registry Agreements to require registries to more prominently disclose their abuse points of contact and provide more granular information to ICANN*) were approved in part per Board Scorecard of 22 October 2020, and **their implementation is in progress with competition estimated between Q3 2023 and Q2 2024** according to the ICANN Specific Reviews Q1 2023 Quarterly Report (31 March 2023)
  - **Recommendation 14** *(incentives to adopt proactive anti-DNS Abuse measures)* and **Recommendation 15** *(negotiate amendments to include provisions aimed at preventing systemic use of specific registrars or registries for DNS Security Abuse, and establish thresholds of abuse for automatic compliance triggers)* **were rejected by the ICANN Board** (resolution of 10 September 2023)

- The **RDS-WHOIS2 Review recommendations LE.1 and LE.2** which sought "*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*" and "*conducting comparable surveys and/or studies with other RDS (WHOIS) users working with law enforcement on a regular basis*" are now **considered to be "*implemented to the extent possible*"** in connection with work of EPDP Phase 2 and 2A as well as the SSAD ODP, per the Implementation Documentation (11 October 2022)

[12] See Communiqué clarification discussions and eventual Board responses to the GAC's Follow-up on Previous Advice in the ICANN70 Communiqué and ICANN71 Communiqué: ICANN70 Clarification call (21 April 2021) and Board response (12 May 2021), and ICANN71 Clarification call (29 July 2021) and Board response (12 September 2021).
[13] See PSWG Conference Call on 14 February 2023 [*GAC website login required*]

Key Reference Documents

- GAC Comments on the Preliminary Issue Report regarding DNS Abuse (18 October 2025))
- ICANN Board Action in response to the ICANN83 GAC Advice (14 Sept. 2025)
- Preliminary Issue Report on a PDP on DNS Abuse Mitigation (8 Sept. 2025)
- Report to the GNSO Council of the Small Team on DNS Abuse (31 July 2025)
- ICANN83 GAC Prague Communiqué (16 June 2025) including GAC Advice to the ICANN Board regarding Policy Development on DNS Abuse issues
- NetBeacon White Paper: Proposal for PDPs on DNS Abuse (21 May 2025)
- ICANN Contractual Compliance update on the first year of enforcing the DNS Abuse mitigation obligations (23 April 2025)
- ICANN Board Comments on Issues of Importance in the ICANN82 Seattle Communiqué (4 April 2025)
- ICANN Board Comments on Issues of Importance in the ICANN81 Istanbul Communiqué (29 January 2025)
- INFERMAL project's Final Report (8 November 2024)
- SSAC SAC115 Report (19 March 2021), a proposal for an Interoperable Approach to Addressing Abuse Handling in the DNS and a the recent Pre-ICANN81 GAC Webinar on DNS Abuse mitigation (4 October 2024) which provided status on the implementation of the SSAC recommendations.
- ICANN Contractual Compliance New DNS Abuse Monthly Reports (since April 2024)
- ICANN Board Comments on Issues of Importance in the ICANN80 Kigali Communiqué (15 October 2024)
- ICANN Board Comments on Issues of Importance in the ICANN79 San Juan Communiqué (9 May 2024)
- Contracted Parties Summit (6-9 May 2024) and recordings of the open sessions.
- Amendment of the Registry Agreement, Amendment of the Registrar Accreditation Agreement and related Advisory: Compliance With DNS Abuse Obligations in the Registrar Accreditation Agreement and the Registry Agreement (published on 5 February 2024 and to become effective on 5 April 2024).
- ICANN Board resolution (21 January 2024) approving the Amendments of the Registry and Registrar Agreements regarding DNS Abuse
- ICANN Board Resolution (10 September 2023) based on ICANN org assessment of pending CCT and SSR2 Review pertaining to DNS Abuse Mitigation
- ICANN org Public Comment Summary Report (1 August 2023) on Public Comment proceeding related to the proposed Amendments of the Registry and Registrar Agreements regarding DNS Abuse

- GAC Comments (17 July 2023) on the proposed Amendments of the Registry and Registrar Agreements regarding DNS Abuse
- Contractual Compliance November 2022 Round Registrar Audit Report (22 June 2023)
- Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations (29 May 2023)
- Inferential Analysis of Maliciously Registered Domains (INFERMAL) announcement (25 April 2023)
- GNSO Small Team on DNS Abuse Report to the GNSO Council (7 October 2022)
- The Last Four years in Retrospect: A Brief Review of DNS Abuse by ICANN org (22 March 2022)
- European Commission Study on DNS Abuse and its Technical Appendix (31 January 2022)
- SSR2 Review FInal Report (25 January 2021) and related GAC Comments (8 April 2021)

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Governmental Advisory Committee Comments on the Preliminary Issue Report regarding DNS Abuse

These GAC comments are proposed in response to the ICANN Public Comment proceeding on "Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation" opened on 8 September 2025 and closing on 18 October 2025.

Introduction

The ICANN Governmental Advisory Committee (GAC) welcomes the opportunity to provide comments on the *Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation* (Issue Report).

The GAC has focused on DNS Abuse as a matter of public policy priority and discussed the issue for years. The GAC's positions are reflected in several statements, including its *Statement on DNS Abuse* (18 Sep. 2019) and its *Comments on the Amendments to the Base gTLD Registry Agreement (RA) and Registrar Accreditation Agreement (RAA) to Modify DNS Abuse Contract Obligations* (17 July 2023). The GAC provided Consensus Advice on policy development related to DNS Abuse to the ICANN Board in the ICANN83 GAC Prague Communiqué (16 June 2025). Taking these discussions and outcomes so far into consideration, GAC members have reviewed the Issue Report, as well as the Preliminary Charter, and herein provide general comments.

The GAC recognizes and appreciates the accelerated work by the members of GNSO DNS Abuse Small Team to provide the foundations for the Issue Report, and thanks ICANN staff for their timely work on drafting the Issue Report and Preliminary Charter.

The GAC supports the two issues identified for Policy Development Processes (PDPs) in the Preliminary Charter – *Unrestricted Application Programming Interface (API) access for high-volume registrations* and *Associated Domain Checks* – **and recommends that chartering of the PDP(s) be constructed in such a way that it prioritizes concrete results before the next round of generic Top-level domains (gTLDs)**. The GAC is planning its engagement in the PDP(s) and looks forward to working with the community towards consensus policy to help mitigate the impact of DNS Abuse upon the public.

Position of the GAC on the Issue Report and Preliminary Charter

Mitigating DNS Abuse has been one of the top priorities for the GAC. Building on the work of the past years and taking into account ongoing community efforts, at ICANN83, the GAC advised the ICANN Board to "*urge the GNSO Council to undertake all necessary preparations prior to ICANN84 towards starting targeted and narrowly scoped Policy Development Processes (PDPs) on DNS Abuse issues, prioritizing bulk registration of malicious domain names and the responsibility of registrars to investigate domains associated with registrant accounts that are the subject of actionable reports of DNS Abuse*."

GAC Comments on the Issue Report

The GAC views the Issue Report as an important contribution to discussions within the community, enabling better communication between stakeholders with different backgrounds, as well as a solid understanding of the subject matter. The Issue Report is well-organized, comprehensive, and conducts a holistic analysis.

The GAC appreciates that the Issue Report prioritizes the issues specified for policy development by the GAC in its ICANN83 Consensus Advice. The Issue Report also identifies and explains a variety of additional "policy gaps" underlying DNS Abuse within ICANN's remit. Many of these gaps were identified by the GAC in its contribution to the public comment process in 2023, at the time of the proposed contract amendments.

To the extent possible, the Issue Report should identify possible paths to address these gaps, whether through further policy development, or through non-binding efforts (e.g., sharing best practices) and cooperation between relevant communities (e.g., limited coordination on Domain Generation Algorithm (DGA)-based abuse). Priority issues for the GAC include:

- **Proactive monitoring as part of preventative measures** (see gaps "P6. Challenges in Real time Detection of Short Lived Abuse" p.15 of the Preliminary Issue Report, and "P7. Underuse of Predictive Algorithms for Early Detection" p.16);
- **Addressing registration data accuracy** (see gaps "P2 and P3: Lack of proactive/Timely contact verification" which recall the recommendation of the GNSO Small Team on accuracy of registration data; and "P8. No Post-Registration Identity Checks for Suspicious Activity);
- **Increased transparency in the reporting obligations** (see gap "C1. Limited Transparency in Mitigation Actions" p.23);
- **Consensus policy on subdomain abuse** (see gap C4 "Unregulated subdomain abuse" p.26)
- **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 "Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks" p. 32)

Hence, the GAC suggests that the report include further proposed actions for the gaps that are not currently prioritized for policy development. Prioritizing several issues to be addressed in the near future is reasonable for swift implementation of countermeasures against DNS Abuse.

GAC Comments on the Preliminary Charter

The GAC supports the two issues identified for Policy Development Processes (PDPs) in the Preliminary Charter – *Unrestricted Application Programming Interface (API) access for high-volume registrations* and *Associated Domain Checks* and offers no change to the proposed scope. The GAC emphasizes that, as a general matter, PDP outcomes should remain business model agnostic. Registrars operate under a range of business models, and it is important that future policies be reasonably applicable and enforceable across the global market.

Packaging and Sequencing should prioritize the swift conclusion of Policy Development

The Preliminary Charter packages two issues into one Policy Development Process. In its ICANN83 Consensus Advice, the GAC supported "*targeted and narrowly scoped Policy Development Processes (PDPs) on DNS abuse*"[1]. The GAC recognizes the opinion that two separate PDPs, each with its own charter and a narrow scope, as opposed to one PDP with a broader scope, would better fit the expectation of targeted and narrowly scoped PDPs. **The GAC favors the approach that has the most chances to "*achieve results according to shorter timelines*"[2] and recommends gathering opinions from stakeholders during the upcoming ICANN meeting.**

Should sequencing be necessary, **the GAC suggests beginning with *Associated Domain Checks* because its scope and charter questions appear to be narrower than those involved in the *API* issue. A narrower scope should lead to a more straightforward path for the ICANN community to consensus.** The GAC appreciates that some concerns have been raised within the GNSO regarding this issue and expects these and other concerns to be discussed and addressed during the PDP process.

Chartering of the PDPs should ensure that whichever topic is addressed first, the implementation of its resulting policy is not dependent upon the issues involved in the other topic.

Additionally, the GAC encourages engagement of ICANN compliance from the very beginning of discussions, in order to ensure that policies developed contemplate enforcement from the outset.

Process and Participation

The GAC would welcome further information prior to the development of the final Charters about the PDP meeting processes and whether, for example, in-person meetings could be scheduled adjacent to regular ICANN meetings (e.g. ICANN85 and ICANN86) in addition to regular virtual meetings, to accelerate progress.

The GAC recognizes that engagement in PDPs can impose a significant workload upon participants. To ensure that the GAC's interests are adequately represented in these PDPs, the GAC requests that the Charters provide for the GAC to appoint **alternates** in addition to members.[3]

[1] See section V.1 in the ICANN83 GAC Prague Communiqué (16 June 2025)
[2] See Rationale of the GAC Consensus Advice to the ICANN in the ICANN83 GAC Prague Communiqué (16 June 2025)
[3] This approach has been taken in previous PDPs. *See* the charter for the Temporary Specification for gTLD Registration Data Expedited Policy Development Process Team, *available at:* temp-spec-gtld-rd-epdp-19jul18-en.pdf.

Timing

As mentioned in the rationale section of the GAC's ICANN83 Advice, the GAC places importance on implementing countermeasures against DNS Abuse in a timely manner and before the delegation of new strings by the New gTLD next round. Initiating PDPs promptly is an essential and responsible step for the ICANN community to take ahead of the new round of gTLDs, to help mitigate the harm caused to the public by DNS Abuse.

To make the forthcoming PDPs more predictable, and to accelerate efforts on DNS Abuse mitigation, **the final Charters should include a specific timeline for policy development and implementation** and include milestones for PDPs so that all stakeholders can track whether necessary efforts are proceeding as scheduled.

Closing

The GAC is grateful to ICANN org for this opportunity to share its perspective on the *Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation* and looks forward to contributing to continued community discussions and the acceleration of the PDPs.