DNS Abuse Mitigation

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28 October 2025 - ICANN84

ICANN | GAC
Governmental Advisory Committee

Agenda

1. Introduction
2. Host Country Presentation
3. Progress towards DNS Abuse Policy Development
4. Trusted Notifiers Programs
5. GAC Dublin Communiqué Consideration

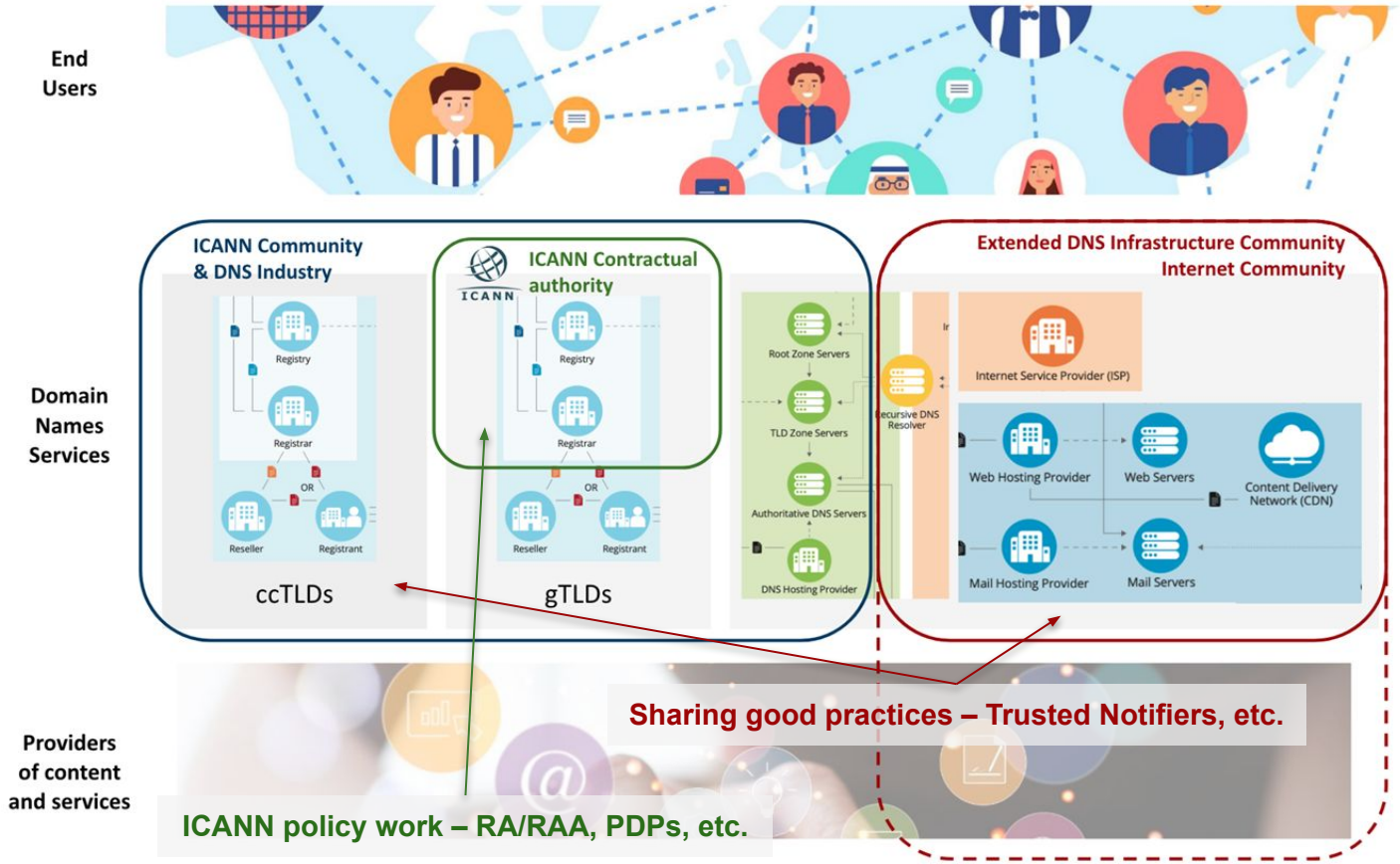
Introduction

- DNS Abuse mitigation is a priority issue for the GAC

- **gTLD Registries and Registrars** are contractually required to respond to reports of DNS Abuse
  - Definition: the use of domain names, or the DNS system, to perpetuate **malware, botnets, phishing, pharming, and spam** (when used as a delivery mechanism)

- The GAC will continue to deliver on its strategic objectives in a approach:
  - Advancing ICANN policy work on DNS Abuse before further delegation of new gTLDs
  - Building the subject matter capacity of GAC Members on DNS Abuse

Introduction



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A lot is being done and can be done beyond the remit of ICANN's contracts.

Internet Infrastructure Services (incl. DNS, Routing, Content Hosting and distribution)

Introduction

- Nov 2024: INFERMAL report suggested some factors (e.g., free API) are strongly correlated with domain abuse.
- May 2025: NetBeacon's White Paper proposed five PDPs on DNS Abuse
  - Associated Domain Check
  - Friction in Bulk Registration for New Customers
  - Subdomain DNS Abuse
  - Registrant Recourse Mechanism
  - Centralized Coordination on DGA Malware and Botnets
- Jun 2025: GAC Consensus Advice to 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**.

Host Country Presentation

Presentation by: **Declan McDermott**

Internet Policy & Regulatory Affairs Manager | .ie

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3. **Progress towards DNS Abuse Policy Development**
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Progress Towards DNS Abuse Policy (1/3)

Background:

- Prague Communiqué GAC Advice urging the GNSO "*to undertake all necessary preparations prior to ICANN84 towards starting targeted and narrowly scoped PDPs*" prioritizing bulk registration and the responsibility of registrars to investigate domains associated with reports of DNS abuse
- Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation released for Public Comments by ICANN org (8 Sep. 2025) upon GNSO request
- Analyses policy gaps in relation to how DNS abuse is addressed
  - Suggests prioritising 3 policy gaps (*unrestricted APIs, associated domain checks and Domain Generating Algorithms - DGAs*)
  - Suggests that *unrestricted APIs and associated domain checks* are appropriate for policy development and proposes a draft PDP charter to address them
  - Indicates that *DGAs* is appropriate for policy but does not necessarily require policy work and could be tackled outside contractual requirements
- Summary of public comments due on 17th of November

Progress Towards DNS Abuse Policy (2/3)

GAC Comments (18 Oct. 2025) on the Preliminary Issue Report:

- Proposed PDPs: **GAC supports the two issues identified for PDPs** 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)**.
- Remaining gaps: GAC indicates that, to the extent possible, **the paper should identify how to address other gaps** and particularly a) proactive monitoring, b) data accuracy, c) transparency in reporting obligations, d) subdomain abuse and e) DGAs.
- 1 vs 2 PDPs: **GAC favors the approach that has the most chances to "achieve results according to shorter timelines"** and recommends gathering opinions from stakeholders during the upcoming ICANN meeting
- PDP process and participation: GAC requests more information on the working methods (i.e., virtual vs in person participation) and the inclusion of *alternate* representatives in the PDP

Progress Towards DNS Abuse Policy (3/3)

PDP structure

- 1 vs 2 PDPs: general agreement on 2 PDPs but details (composition, timing, sequencing, ..) still to be defined in the charter and subject to range of opinions
- Interest in a 3rd PDP as some communities support policy work on DGAs

Unrestricted APIs

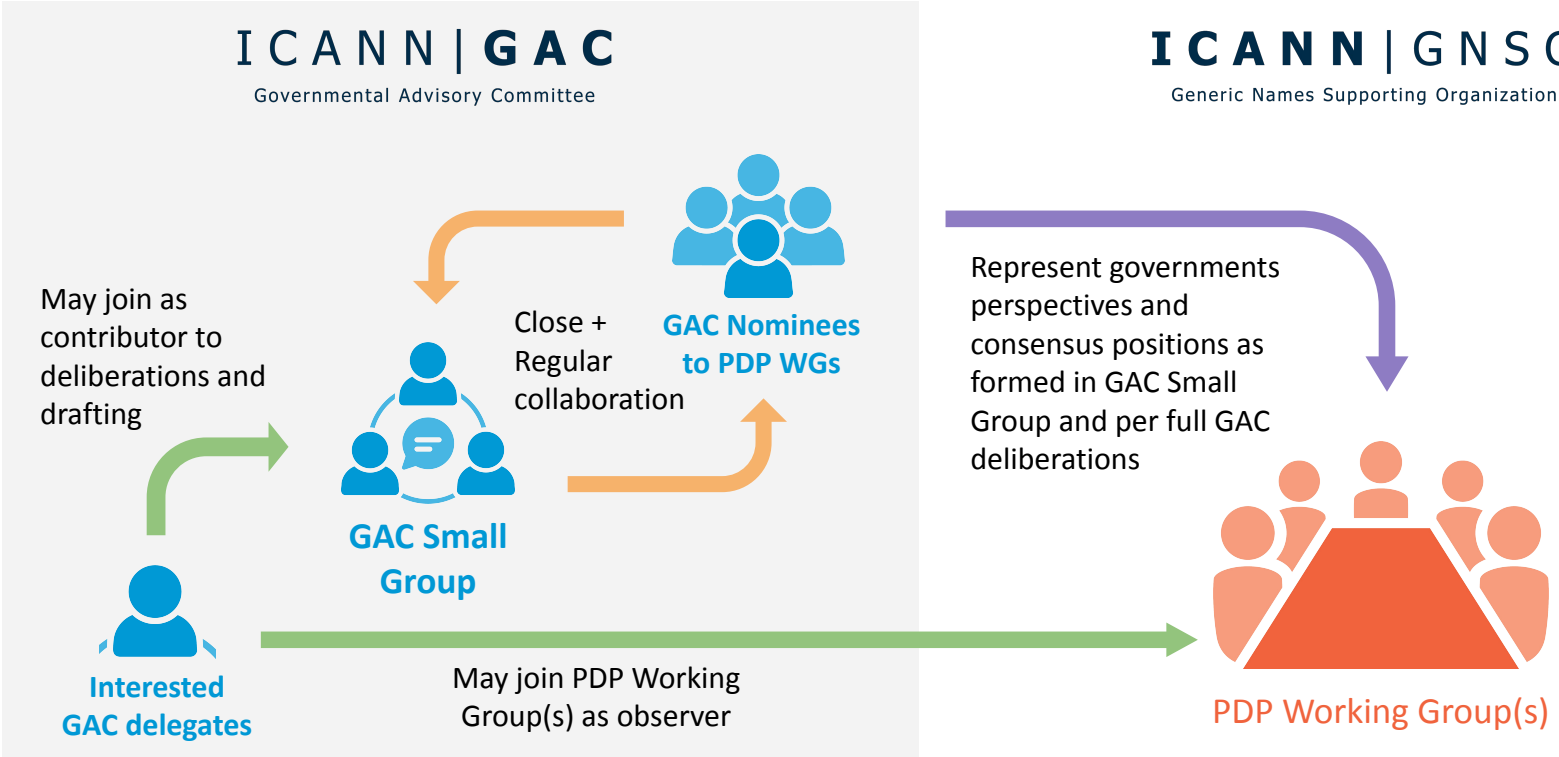
- Problem definition to be scoped better? (APIs as one of the way to register in bulk, not the only)
- PSWG consideration of including organisations identity checks to the charter

Associated domain names

- Priority for GAC / relatively simple to address for most communities / concerns for the NCSG
- Balance to find between transparency regarding the basis on which checks are done (which registrant characteristics, i.e., account, identity, payment method) and accountability of CPs

GAC Participation in DNS Abuse PDP Working Group(s)

Adopt for DNS Abuse PDPs the GAC Small Group Model used since 2018 on Registration Data ?



DNS Abuse PDPs - GAC discussions

Questions for GAC discussion:

1. Concerning the **upcoming PDP(s)** and building on the outcomes of the GNSO session of Sunday, does the GAC have feedback to convey to the GNSO and the community on the structure of the PDPs, the topics at stake or both?
    a. Are there already GAC members potentially interested in being involved in the PDP work, either as representative of the GAC or alternates, or in the small group?
2. Concerning the **remaining policy gaps** and following the GAC response to the public comment, is there any further message that should be passed to the community in terms of GAC expectations or prioritisation ahead of the new round?
3. Are there additional considerations on DNS abuse which should be brought to the discussions based on the Preliminary Issue Report?

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4. **Trusted Notifiers Programs**
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GAC Annual Plan 2025/2026 Reminder

ANNUAL PLAN 2025/2026

For endorsement by the GAC in the ICANN84 GAC Dublin Communiqué

GAC Strategic Objective 4 - DNS Abuse

Expected Outcomes in 2025/2026

Expected Outcomes regarding capacity building

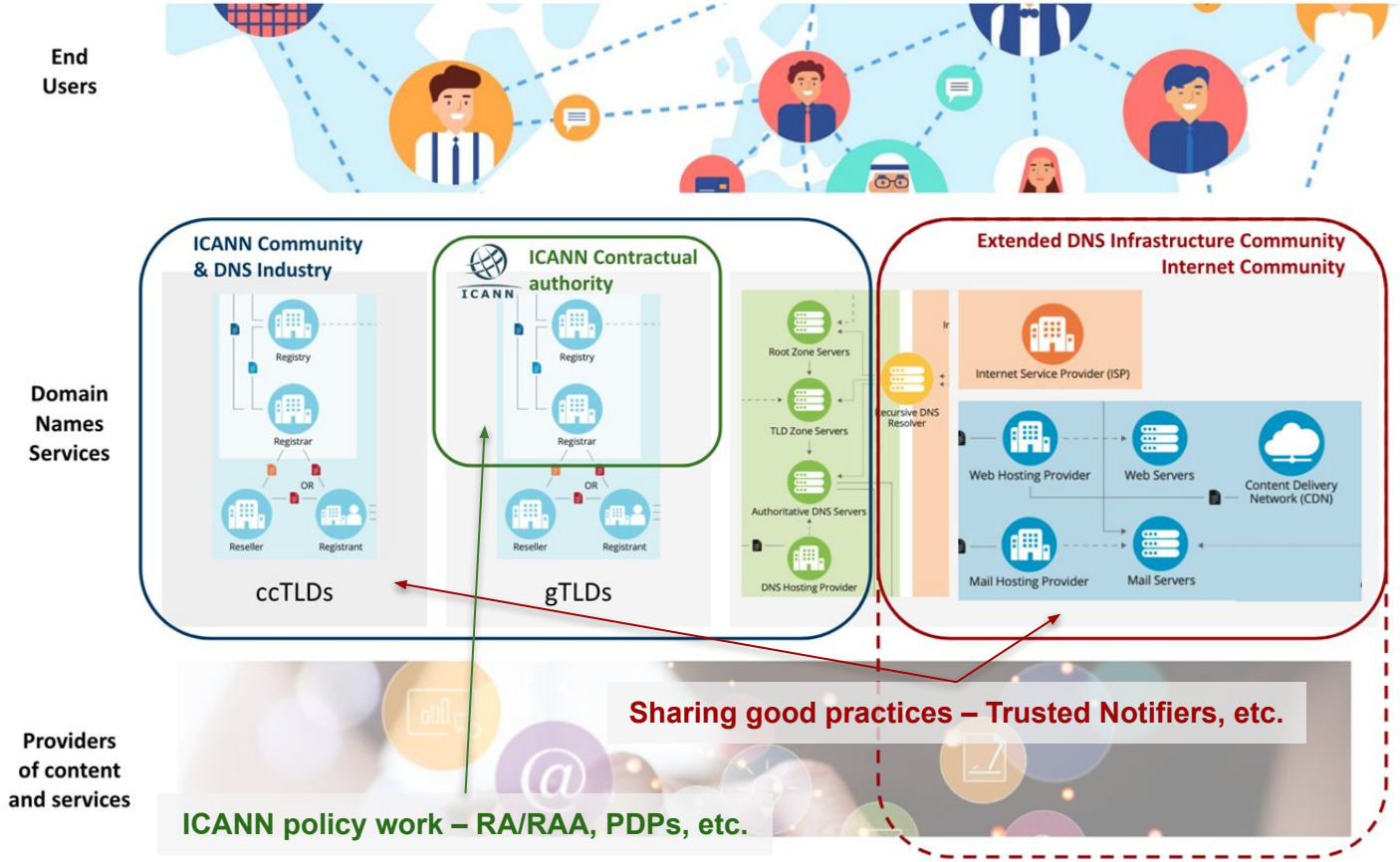
4.5. **Increase the availability of training and briefing material on the fundamentals of DNS Abuse**, for GAC newcomers, as well as any interested GAC Members, including ICANN briefings, GAC webinars, studies, and other relevant content.

4.6. **Tailor training and briefing material** according to GAC Member knowledge needs.

4.7. **Provide GAC members with examples of best practices, guidelines, or trusted notifier programs** that may assist DNS Abuse policy development within their respective jurisdictions

Source: GAC Annual Plan 2025/2026 for GAC Endorsement during ICANN84 (p.9)

Trusted Notifier Programs - Overview



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Internet Infrastructure Services (incl. DNS, Routing, Content Hosting and distribution)

The APAC Trusted Notifier Network

Presentation by:

Jo-Fan Yu, Managing Director and CEO, TWNIC

Edmon Chung, CEO, DotAsia

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GAC Dublin Communiqué Consideration

- Issues of Importance
  - Review of DNS Abuse mitigation work at ICANN
  - Encourage the ICANN Community to move forward
  - Support prompt delivery of policy on DNS Abuse on two issues before the next round of generic Top-level domains (gTLDs)
  - Request further consideration of possible paths to address policy gaps not currently prioritized