

DNS Abuse Mitigation

GAC Topic Leads:

Martina Barbero (European Commission)
Tomonori Miyamoto (Japan)
Susan Chalmers (United States)

Guest Speakers:

Diego Alejandro Palomino (Spanish National Police)
Karen Rose (Interisle Consulting Group)
Alan Woods (CleanDNS)
Graeme Bunton (NetBeacon)
Steinar Grøtterød (ALAC)
Rod Rasmussen (SSAC)
Reg Levy (RrSG)
Dennis Tan (RySG)
Vivek Goyal (CSG)
Michaela Nakayama Shapiro (NCSG)

10 June 2026 - ICANN86

Agenda

- 1. Introduction (5 min)**
- 2. Host Country Presentation: Phishing and Domain Abuse (20 min)**
- 3. Interisle Study: Malicious Domain Name Registrations Study (5 min)**
- 4. DNS Abuse Associated Domain Check PDP Deliberations (15 min)**
- 5. Discussion with ICANN Stakeholders (40 min)**
 - **Associated Domain Check PDP**
 - **DNS Abuse More Broadly**
- 6. GAC Seville Communiqué Consideration (5 min)**

Introduction

- DNS Abuse mitigation is a priority issue for the GAC
- Expected Outcomes in the [GAC 2025/2026 Annual Plan](#) regarding DNS Abuse:
 - Advancing ICANN policy work on DNS Abuse before further delegation of new gTLDs
 - Building the subject matter capacity of GAC Members on DNS Abuse
- *DNS Abuse* means malware, botnets, phishing, pharming, and spam (when spam is used as a delivery mechanism for any of the other four types of DNS Abuse)
- **gTLD Registries and Registrars** are contractually required to *respond* to reports of DNS Abuse; **ICANN Compliance** audits and enforces these contract requirements.

Introduction

- ICANN83 (June 2025): GAC issues Consensus Advice to ICANN Board in the [GAC Prague Communiqué](#)

*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.***

- Oct 2025: [Final Issue Report](#) on a Policy Development Process on DNS Abuse Mitigation
- Jan 2026: GNSO adopts [PDP Charter](#) for an “Associated Domain Check”
 - PDP 1: Associated Domain Checks – started in March 2026
 - PDP 2: Safeguards for API access to new customers

Host Country Presentation: Phishing and Domain Abuse

- Presentation by **Mr. Diego Alejandro Palomino**
Senior Detective and Head of Logic Safety Section
Central Cybersecurity Unit
Spanish National Police

Malicious Domain Name Registrations Study (Interisle Consulting Group)

- Presentation by **Karen Rose**
Interisle Consulting Group

DNS Abuse ADC PDP Deliberations

- [GAC Prague Communiqué](#) (16 June 2025) **Advice to the ICANN Board**
- [Final Issue Report on a DNS Abuse PDP](#) (4 Dec. 2025) **identifies several policy gaps** but specific **focus on two issues for PDP:**
 - **1) Associated Domain Names Checks (ADC, PDP1)**
 - **2) unrestricted access to APIs for bulk registrations (PDP2)**
- In January 2026, **the GAC established its Small Group on DNS Abuse** to *“support and advance strong government engagement of the GAC in DNS Abuse policy development at ICANN”*.
 - 17 GAC and PSWG participants from 12 GAC delegations,
 - Meeting weekly to prepare the GAC’s engagement in the GNSO DNS Abuse PDP1 Working Group.
- In coordination with the GAC Leadership, the Small Group proposed that the following individuals **represent the GAC** consistent with the agreed composition **in the PDP1 WG:**
 - **Martina Barbero** (European Commission)
 - **Gabriel Andrews** (US FBI, PSWG Co-Chair)
 - **Wolfgang Holzapfel** (Germany, PSWG)
 - **Naoum Mengoudis** (Hellenic Police/Europol EMPACT, PSWG)
- Launch of PDP2 when PDP1 has made progresses (?)

DNS Abuse ADC PDP Deliberations

During a pre-ICANN86 [Prep Week update webinar](#) (20 May 2026), the Working Group reported on its 12 meetings to date and shared the current “direction of deliberations” on the key charter questions as reflected in the [DNS Abuse Mitigation PDP1 Working Group Coordination Document](#):

- [Trigger for Associated Domain Check](#) (Question 1): Section 3.18.2 of the Registrar Accreditation Agreement (RAA) - availability of actionable evidence of DNS abuse on one domain
- [Criteria to define association between domains](#) (Question 2): Review Registered Name Holder and/or account-related indicator, technical or coordinated activity/behavioural indicator, that is reasonably accessible to the registrar.
- [What constitutes a "reasonable investigation" by a registrar](#) (Question 3): Apply association criteria for ADC in a reasonable and proportionate manner.
- [What data access and privacy safeguards are necessary](#) (Question 4): An ADC MUST be conducted in compliance with applicable law, contractual requirements, and data privacy safeguards.
- [Remedies in case of adverse impact on registrants](#) (Question 5): Certain existing procedures, contractual obligations, and legal frameworks already provide safeguards relevant to conducting ADC.
- [Timeline for conducting an Associated Domain Check](#) (Question 6): Initiate and conduct ADC “promptly” following the receipt or identification of actionable evidence of DNS Abuse.

Part I - Stakeholders Discussion on Associated Domain Checks

Panelists

1. CleanDNS: Alan Woods,
2. ALAC: Steinar Grøtterød
3. SSAC: Rod Rasmussen
4. RrSG: Reg Levy
5. RySG: Dennis Tan
6. CSG: Vivek Goyal
7. NCSG: Michaela Nakayama Shapiro

Discussion questions

- Based on the current state of the discussions in the PDP, can you highlight areas of agreement and areas of disagreement from your SO/AC perspective?
 - i.e., Do you align with the spirit of the initial strawman answers to the Charter questions already discussed? if yes/no explain why
- What aspects of the PDP discussions seem to be mature enough from your perspective and could lead to an agreement relatively soon?
- What is the main challenge that remains to be solved according to your SO/AC?

Part II - Stakeholders Discussion on DNS abuse beyond the PDP

Presentations

- DNS Abuse Mitigation at scale **Graeme Bunton, NetBeacon**
- Human Rights Impact of DNS Abuse **Michaela Nakayama Shapiro, Article 19**

GAC Seville Communiqué Consideration

- Issues of Importance
 - Associated Domain Check Policy Development
 - Future DNS Abuse Policy Development
 - Possibilities for future efforts and collaborations