

DNS Abuse Mitigation

GAC Topic Leads:

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Guest Speakers:

Ashwin Sastrosubroto (Indonesia GAC Rep)
Ery Punta Hendraswara (.id)
Tatsuo Ninoseki (JPMAC)
Leticia Castillo (ICANN Compliance)
Sam Cheadle (ICANN OCTO)
Rafik Dammak (NCSG)
Eunice Alejandra Pérez Coello (ALAC)
Bruce Tonkin (ccNSO)
Rod Rasmussen (SSAC)

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I C A N N | G A C

Governmental Advisory Committee

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**.*

- Dec. 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

- Presentation by **Ashwin Sastrosubroto**
GAC Representative for Indonesia

Ery Punta Hendraswara
Vice-Chair of PANDI, .id ccTLD Registry

Presentation on Domain Hopping

- Presentation by **Tatsuo Ninoseki**
JPMAC

- Presentation by **Leticia Castillo**
ICANN Contractual Compliance

Presentation on Associated Domain Measurement

- Presentation by **Sam Cheadle**
ICANN Office of the CTO (OCTO)

DNS Abuse PDP1 ADC Background

- [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 focus on 2 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.
- Individuals currently **representing the GAC in the PDP1 WG:**
 - **Martina Barbero** (European Commission)
 - **Gabriel Andrews** (US, PSWG Co-Chair)
 - **Janos Drienyovszki** (European Commission, PSWG Co-Chair)
 - **Emanuele Lovini** (Europol, PSWG)

DNS Abuse PDP1 ADC Deliberations Update

- The DNS Abuse PDP1 WG published its [Initial Report](#) (18 August 2025) including 8 recommendations and associated guidance addressing the 9 charter questions, including:
 - the definition of the triggers for and investigation of Associated Domain Checks;
 - what should be considered a reasonable such investigation;
 - what the timeline of such investigation should be;
 - how "association" should be determined;
 - what safeguards should be in place in the performance of ADCs;
 - how the effectiveness of the policy should be measured; and how compliance with the policy should be demonstrated.
- [GAC Comments](#) (28 September 2026) were submitted along with 39 other contributions in the [Public Comment proceeding](#). The GAC expressed support for most of the recommendation and implementation guidance as written, with the exception of:
 - Recommendation 5 (Safeguards for ADC Investigations)
 - Recommendation 8 (Demonstrating Compliance)

DNS Abuse PDP1 ADC Deliberations Update

- 4 meetings of the PDP scheduled during ICANN87 to discuss the input from the Public Comment
 - During each PDP meeting the group discusses input on two recommendations and related Implementation Guidelines, focusing on a) new elements, b) unintended consequences and c) clarifications needed → no relitigating previously discussed point.
- The objective: to process the Public Comment input, produce a new version of the recommendations by November and approve and send it to GNSO Council by December → significantly shorter PDP timeline compared to initial planning.
- The GAC Small Group on DNS abuse will discuss the new version of the text and develop GAC positions before the final reading ... open call to join this group in case of interest!
- Overall: the PDP is progressing faster than expected and GAC input considerably shaped the recommendations (i.e. on the trigger).
 - Work on cross-registrars collaboration to be considered for future policy making.

DNS Abuse PDP2 Safeguards for access to registrations at scale

- Prior to ICANN87, the GNSO Council convened a [PDP2 Charter Drafting Team](#)
- Because the GAC does not hold an observer seat in the GNSO Council, it cannot join such a drafting team. However, the GNSO leadership invited the GAC to submit a one-time input
- The GAC Small Group on DNS Abuse thus provided, on behalf of the GAC, [GAC Input on the PDP2 Charter](#) (25 September 2026) which highlighted:
 - The need for the charter language to be technology neutral
 - That discussion of registrants' recourse should be out of scope and moved to a dedicated, separate policy effort,
 - That adverse impact to end user rights of ineffective safeguards to prevent malicious registrations for DNS Abuse campaigns should be considered throughout the process
 - The need for the PDP to require registrars to enforce obligations and controls over resellers and agents authorised to access registrar platforms
 - That the envisioned Safeguards should apply based on the high-speed high-volume capability being provided, irrespective of the technology or arrangements involved

Stakeholders Discussion on PDP1 and PDP2

Panelists

- NCSG: **Rafik Dammak**
- ALAC: **Eunice Alejandra Pérez Coello**
- ccNSO: **Bruce Tonkin**
- SSAC: **Rod Rasmussen**

Discussion questions

1. What major hurdles does your SO/AC/SG see on the way to agreeing on an effective set of policy recommendations for PDP1 ?
2. What is your SO/AC/SG's view on the scope of PDP2 and what is most important for your group to addressed in this PDP ?

- Issues of Importance
 - Support the finalisation of the work on PDP1 on Associated Domain Checks and the launch of a narrowly-scoped PDP2 on Unrestricted Access to APIs/bulk registration
 - Recognise that work on DNS abuse expands beyond PDP1 and PDP2, and that there are other issues to address from the Issue Report (i.e., transparency of reporting, proactive measures, ...)
 - Express interest in hearing further about the GNSO prioritisation work
 - ...