

DNS Abuse Mitigation PDP

NCSG Positioning

ICANN86 June 2026

Priority Issues for the NCSG

Two Key Issues

Preliminary Recommendation 3: **Defining a 'reasonable investigation'**
Preliminary Recommendation 7: **Topics for consideration to GNSO Council**

Defining a 'Reasonable' Investigation

How to define a 'reasonable investigation'

The NCSG's position is that the investigation standard must be proportionate to the harm of the abuse. We recommend calibrating to the severity of the reported abuse, portfolio size, and registrar business model.

Defining a 'reasonable investigation'

NCSG's Suggested Additions

A reasonable investigation **MUST** be practical, **narrowly-scoped**, and proportionate based on the circumstances and consistent with Section 3.18.2. A reasonable investigation **IS NOT a general audit of the registrant's broader portfolio and MUST NOT** require registrars to access or generate data that is not reasonably available to them **at the time of review**, recognizing that registrar capabilities, technical systems, and available data may differ across and within registrars.

A reasonable investigation should:

- **Be narrowly scoped**
- **Be targeted towards identifying whether the same registrant or account has other active domains that are also being used for similar abuse**
- **NOT require registrars to access or generate data that is not reasonably available to them at the time of review.**

Topics for consideration to GNSO Council

NCSG's Suggested Addition

- **DNS abuse mitigation safeguards, such as transparency reporting requirements and accountability measures**

Strawman Language

During its deliberations, the WG came across topics that were out of scope for this PDP but should be considered by the GNSO Council when considering the follow-up PDPs or next steps on DNS Abuse. Therefore, the WG recommends to GNSO Council to consider further policy work and or next steps as noted in the Final Issue Report on the following two issues that related to broader DNS Abuse Mitigation rather than ADC:

- **Limited Transparency in DNS Abuse Mitigation Actions taken (Issue C1 in Final Issue Report)**
- **Lack of Standard Dispute/Recourse Mechanism for Registrants for mitigation actions taken in response to DNS Abuse (Issue C3 in Final Issue Report)**