

Public Comment Summary Report

DNS Abuse Mitigation PDP 1 Initial Report

Open for Submissions Date:

Tuesday, 18 August 2026

Closed for Submissions Date:

Monday, 28 September 2026

Summary Report Due Date:

Friday, 09 October 2026

Category: Policy

Requester: Generic Names Supporting Organization (GNSO)

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Open Proceeding Link:

<https://www.icann.org/en/public-comment/proceeding/dns-abuse-mitigation-pdp-1-initial-report-18-08-2026>

Outcome:

The DNS Abuse Mitigation Policy Development Process (PDP) 1 Working Group (WG) received a total of forty-two (42) Public Comments from a broad range of stakeholders across the community. All eight (8) Preliminary Recommendations and five (5) Preliminary Implementation Guidance items attracted feedback, including substantive input from commenters who otherwise supported the proposed Outputs. Across the categorized responses to the Preliminary Recommendations and Implementation Guidance, approximately 85 percent were supportive, with 56 percent supporting the Outputs as written and 29 percent supporting their intent with wording changes. Approximately 3 percent of responses were categorized as requiring significant change, while 0 percent of responses categorized the Outputs as “do not support should be deleted.” While 12 percent were classified as “Other,” many of the submissions in this category took no position on the specific Outputs. Overall, commenters broadly supported the objective of establishing a baseline requirement for Associated Domain Checks (ADCs) to help address DNS Abuse beyond a domain-by-domain approach. At the same time, the submissions provided extensive input on the wording, scope, safeguards, implementation, compliance, and future assessment of the proposed requirements. Commenters raised a range of considerations regarding how ADCs should operate in practice, with differing views on the appropriate balance between clear and consistent baseline requirements and sufficient flexibility to account for different circumstances, business models, and registrar capabilities.

At the time of publication of this Summary Report, no changes to the Preliminary Recommendations or Implementation Guidance have been adopted as a result of the Public Comment input. The WG will begin taking the Public Comments into consideration at ICANN87, Bali. The comments received provide the WG with a substantial record against which to reassess its preliminary conclusions, consider issues or implementation considerations that may

not have been fully addressed during its earlier deliberations, and determine whether revisions or clarifications are needed for the Final Report.

Section 1: What We Received Input On

The DNS Abuse Mitigation PDP 1 Working Group (WG) sought Public Comment on its [Initial Report](#). The WG was chartered by the GNSO Council to create an obligation for registrars to investigate other domains associated with a customer account or registrant where at least one domain is found to be engaged in DNS Abuse, as defined in the [Registrar Accreditation Agreement \(RAA\)](#). Accordingly, the DNS Abuse PDP 1 is focused on associated domain checks, which would require registrars to investigate domains linked to actionable evidence of DNS Abuse.

The Initial Report for Public Comment consists of eight (8) Preliminary Recommendations and five (5) Implementation Guidance items. Additionally, the WG has completed [comprehensive impact assessments](#) including the human rights impact assessment, the global public interest checklist, consideration of data privacy issues, and an evaluation of impact of the group's preliminary recommendations on existing ICANN consensus policies.

Section 2: Submissions

Organizations and Groups:

Name	Submitted by	Initials
NetBeacon Institute (PIR)	Schoo, Rowena	
Excedo Security Operations Digital Crimes Unit EU		
The Internet Service Providers and Connectivity Providers Constituency		ISPCP
Messaging, Malware and Mobile Anti-Abuse Working Group	Cadagin, Amy	M3AAWG
Wix.com	Yakushenko, Karyna	
Afnic	Georgelin, Marianne	
Root Server System Advisory Committee		RSSAC
WIPO Arbitration and Mediation Center	Beckham, Brian	
Doppel	Bacon, Elizabeth	
Whois API Inc.	Chiao, Ching	
Motion Picture Association	Meys, Romain	MPA
Registries Stakeholder Group		RySG
Nominet UK	Vincent, Jake	
Governmental Advisory Committee		GAC
Ministry of Electronics and IT, Government of India	Verma, Pradeep	GOI
Tucows	Sarah Wyld	
Hennes & Mauritz GBC AB		H&M
APIGA 2026 & NetMission.Asia APAC Youth Community	Joshi, Manas	
ICANN org		
Intellectual Property Constituency		IPC
The Coalition of Online Accountability	Huges, David	COA
Openprovider.com – Domain Registrar	Relekar, Abhijit	
Swedish Anti-Counterfeiting Group	Looft, Sandra	SACG
Registrar Stakeholder Group		RrSG
Squarespace Domains	Rokobauer, Eric	
International Trademark Association	Schulman, Lori	INTA
CleanDNS, Inc.	Woods, Alan	
Security and Stability Advisory Committee		SSAC

At-Large Advisory Committee		ALAC
auDA	Williams, Annaliese	
Business Constituency		BC
Pakistan Youth IGF	Ali, Muhammad Umair	

Individuals:

Name	Affiliation (if provided)	Initials
Ndubi, Laura		
Mobarak, Musawer		
Cherayath, Joseph		
Yousefi, Karen		
Sattler, Tobias	Independent Researcher	
Simmandree, Nikesh B.		
Cambronero, Fatima	Individual Capacity, Legal Practitioner	
Rimpee, Joyeeta Sen		

Section 2a: Late Submissions

At the discretion of the ICANN organization, two (2) late submissions were accepted for Public Comment consideration. The full comments from late submissions are linked below:

- 1) [Non-Commercial Stakeholder Group \(NCSG\)](#) / Submitted by Farzaneh Badii.
- 2) [i2Coalition](#) / Submitted by Christian Dawson.

Section 3: Summary of Submissions

To facilitate the DNS Abuse Mitigation PDP 1 WG's review of the Public Comment submissions, the GNSO Support Staff developed a [Public Comment Review Tool](#). This tool provides a comprehensive accounting of the views expressed on the Initial Report, together with the detailed submissions from each contributor. The Public Comment Review Tool is available for review on the dedicated [wiki page](#).

Section 4: Analysis of Submissions

The DNS Abuse Mitigation PDP 1 WG is responsible for the review and analysis of submissions and will review all Public Comment input through its Public Comment Review Tool and subsequent deliberations. Please note that, at the time of publication of this summary report, the WG will not yet have commenced its review and deliberations on the Public Comment submissions.

Against this backdrop, and in line with the structure of the Guided Submission Form, the [Public Comment Review Tool](#) categorized comments from each contributor for each of the eight Preliminary Recommendations and five Preliminary Implementation Guidance items. Of the 42 Public Comment submissions received, 41 provided categorized responses to these Outputs. Across the 533 categorized responses, approximately 85 percent were supportive: 56 percent supported the Outputs as written and 29 percent supported their intent with wording changes. Approximately 3 percent of responses were categorized as requiring significant change, while 0 percent of responses categorized the Outputs as “do not support should be deleted.” Of these 12 percent were classified as “Other,” and many of the submissions in this category took no position on the specific Outputs. Overall, supportive responses represented a substantial majority for each individual Preliminary Recommendation and Implementation Guidance item, ranging from approximately 78 to 90 percent across the Outputs.

While these figures demonstrate broad support for the overall direction of the Initial Report, the written submissions contained substantial additional input across all of the Preliminary Recommendations and Implementation Guidance. In many instances, commenters that supported an Output as written, or supported its intent, also identified issues for the WG to consider, requested clarification, proposed alternative or additional language, or raised questions regarding implementation. Accordingly, the response categories alone do not reflect the full scope or substance of the feedback received.

Across the submissions, commenters addressed a wide range of issues concerning how Associated Domain Checks (ADCs) should operate in practice. These included the evidentiary basis for initiating an ADC; the treatment of compromised domains; the scope and proportionality of an investigation; criteria for determining whether domains are associated; the information that may or should be considered; the role of external reports and other sources of information; and the application of the requirements in reseller and other differing registrar business models. Commenters also discussed the need to balance effective investigation of coordinated DNS Abuse with appropriate safeguards against unsupported association, false positives, or unintended impacts on legitimate Registered Name Holders.

Additional input addressed privacy, data processing, applicable law, operational flexibility, timing, documentation, demonstrable compliance, and the respective roles of registrars and the ICANN organization in implementation and enforcement. Commenters expressed differing views regarding the appropriate level of specificity in the policy requirements, with some favoring greater definition, minimum standards, or illustrative guidance, and others emphasizing the importance of preserving flexibility for registrars to respond to differing facts, circumstances, capabilities, and business models.

The submissions also included substantial feedback concerning implementation and the assessment of the policy after it takes effect. Commenters discussed how compliance with the ADC requirements should be demonstrated, what information should be retained or reported, how “prompt” should be evaluated, and how the effectiveness review contemplated by the Initial Report should measure the impact of the policy. Suggestions addressed both registrar-side implementation and broader outcomes, including whether ADCs improve the identification and mitigation of coordinated DNS Abuse while avoiding disproportionate impacts on legitimate registrants.

The optional sections of the Guided Submission Form generated additional feedback on the rationales, impact assessments, and other matters related to the Initial Report. Seventeen of the 42 submissions provided comments on the Impact Assessments, while 26 provided additional

comments outside the structured Recommendation and Implementation Guidance questions. Responses to the optional rationale sections ranged from a low of 13 to a high of 20 submissions of the 42 commenters.

Overall, the Public Comment submissions reflected broad support for the objective of establishing a baseline requirement for Associated Domain Checks, accompanied by extensive substantive input regarding the wording, scope, safeguards, implementation, compliance, and future assessment of the proposed requirements. The breadth of this feedback indicates that the WG's review will require consideration not only of areas where commenters expressed differing views, but also of proposed clarifications and implementation considerations raised by commenters that otherwise supported the Preliminary Recommendations and Implementation Guidance.

Section 5: Next Steps

The DNS Abuse PDP 1 WG will commence its review of the Public Comments at the ICANN87 Annual General Meeting in Bali, Indonesia (October 2026). Following the review and analysis of the Public Comments received for the Initial Report, the WG will consider whether any revisions to its Preliminary Recommendations are warranted. The Final Report will be published for the GNSO Council's consideration after a formal Consensus Call on the Final Report.