



2023-07-20

Re: Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations

The DNS Abuse Institute (DNSAI) appreciates the opportunity to comment on the proposed contractual changes related to DNS Abuse. We would like to start by commending ICANN and the contracted parties for the swiftness of this process, and their mutual interest in reducing DNS Abuse.

The DNS Abuse Institute is deeply supportive of these amendments. Most importantly, we see the unambiguous requirement to mitigate malicious domain registrations as meaningful progress in the work to reduce DNS Abuse. We also appreciate that the amendments acknowledge that mitigating abuse is difficult, contextual, and ever-evolving. We think ensuring that abuse is mitigated, rather than prescribing methods is a sensible approach. We look forward to supporting registries and registrars as they tackle DNS Abuse.

We are also pleased that for the first time, ICANN Contractual Compliance will have the tools to start enforcement actions on the registrars and registries that systematically fail to take action to mitigate DNS Abuse, as required by these new obligations.

Our efforts in improving abuse reporting processes have shown us the importance of forms, APIs, and structured reporting over free-form email. As such, the acceptance of web-form based DNS Abuse reporting methods is a positive change.

We note that the definition of DNS Abuse used in these amendments comports with the generally accepted definitions from the Internet and Jurisdiction Policy Network, the Contracted Party House, the Framework to Address Abuse, as well as the DNS Abuse Institute's own. This focused definition will enable continued forward progress on these issues, and, more importantly, remains within ICANN's bylaws and remit, by excluding website content abuse issues.

In our [letter to the GNSO Small Team on DNS Abuse](#), we advocated for a series of tightly scoped PDPs on issues related to DNS Abuse. We remain committed to further ICANN community work on this issue, and will assist in whatever ways are appropriate. The DNS



Abuse Institute will continue to support registrars, registries, ICANN, and the rest of the community as best it can in their efforts to reduce DNS Abuse.

The significance of implementing a globally applicable standard for the mitigation of DNS Abuse, and the speed with which these negotiations took place, cannot be overstated. While further policy work within the multi-stakeholder model is needed, these amendments lay the base obligations on which ICANN, and the DNS Community can pursue a safer, more secure global Internet.

Regards,

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DNS Abuse Institute