The proposed revision of RA and RAA include a definition of DNS abuse. Whether it is phishing or other security-related abuse included in the definition or content-related abuse not included in the definition, it is commonly important to ensure that the same person does not repeatedly engage in abusive behavior. In this regard, even if measures are taken to stop or disrupting DNS abuse when it occurs as a result of this revision, it is unfortunately easy for the same perpetrator to repeat the same or similar abuse by acquiring a new e-mail address. In order to prevent such repeated abuse, it is extremely important that registrars properly verify the identity of domain registrants.

The current RAA requires that domain registrants provide accurate identity information. Namely, RAA 3.7.7.1 states, "The Registered Name Holder shall provide to the Registrar accurate and reliable contact details," and 3.7.7.2 states, “A Registered Name Holder's willful provision of inaccurate or unreliable information, its willful failure to update information provided to Registrar within seven (7) days of any change, or its failure to respond for over fifteen (15) days to inquiries by Registrar concerning the accuracy of contact details associated with the Registered Name Holder's registration shall constitute a material breach of the Registered Name Holder-registrar contract and be a basis for suspension and/or cancellation of the Registered Name registration."

However, in the "RDDS ACCURACY PROGRAM SPECIFICATION" included in the RAA, registrars may verify the accuracy of a registrant's identity by calling the registrant's telephone number, sending an SMS, or by sending an email to the registrant's email address and receiving a response (SPECIFICATION 1.f.i. and ii.). Since it is easy to obtain a new e-mail address based on the identifying information of a non-existent individual, this verification method is clearly insufficient to ascertain the exact identity of the registered name holder.

Therefore, although the RA and RAA revisions currently being proposed are an important step as appropriate measures against DNS abuse, they are not expected to be effective enough to prevent abusers from repeating similar acts in the future. In order to prevent similar acts in the future and to restore the reliability of information circulated on the internet, it is necessary to incorporate a mechanism in the RAA for registrars to accurately verify the identity of registered name holders, and we strongly hope that ICANN will hold discussions to this end going forward.