

# TLD Registry Limited OY Public Comment to Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations

## Executive Summary

TLD Registry Limited OY welcomes and supports the proposed amendments to the gTLD Registry Agreement and Registrar Accreditation Agreement.

## About TLD Registry Limited OY

TLD Registry Limited OY is the Registry Operator for xn--3ds443g (在线) and xn--fiq228c5hs (中文网).

TLD Registry Limited OY has since the launch of xn--3ds443g (在线) and xn--fiq228c5hs (中文网) taken a proactive approach to mitigate DNS abuse within our namespaces. The number of reported abuse cases are minimal. When received, all cases have been acted on and solved within a very short period.

## Proposed improvements to the Registry Agreement

TLD Registry Limited OY welcomes the adjustment to alter from “security threats” to “DNS Abuse” with the reference to SAC115 definition of DNS Abuse.

In particular, adding “spam” as when spam is used as a delivery mechanism for any of the other four types of DNS abuse, is of importance in DNS Abuse mitigation.

## SPECIFICATION 6 REGISTRY INTEROPERABILITY AND CONTINUITY SPECIFICATIONS

In our view, Specification 6 is a significant improvement in addition to clarifying the Registry Operator obligations. TLD Registry Limited OY is in favor of the added Specification 6.4.2 in the Registry Agreement.

# Proposed improvements to the RAA

## RAA 3.18.1 Abuse contact

The RAA 3.18.1 states the requirements for the Registrar to “*maintain an abuse contact*” and “*publish an email address or webform*” for reporting DNS abuse. This is also referenced in the ICANN Advisory - DNS Abuse Amendments covering “Where to address abuse”.

There are several recommendations on who (i.e. what entity) is best to mitigate DNS abuse<sup>1</sup>. TLD Registry Limited OY supports the mitigation paths in general. The problem is that a Registrar reseller, hosting provider or registrant is hard to find due to privacy legislation<sup>2</sup>, hence information about the sponsoring registrar abuse contact may be the only known contact.

Due to this, TLD Registry Limited OY recommends adding to the RAA 3.18.1 **or** the “ICANN Advisory - DNS Abuse Amendments” obligations to the Registrar to forward received abuse reports to the preferred entity for DNS Abuse mitigation. The sponsoring Registrar will have the needed contact details in their system.

## RAA 3.18.2

In our view, the added RAA 3.18.2 is a significant improvement for combating DNS abuse. The RAA 3.18.2 AND the ICANN Advisory - DNS Abuse Amendments gives the sponsoring Registrar for a reported domain name, a clear and defined process to act.

In addition, we have the understanding that the RAA 3.18.2 and the ICANN Advisory - DNS Abuse Amendments will give ICANN Compliance the needed data for issuing compliance tickets to Registrars not being in compliance with the RAA.

We presupposed that the scenarios given in the ICANN Advisory - DNS Abuse Amendments are given as examples and not to be seen as complete.

TLD Registry Limited OY supports the added RAA 3.18.2 section.

---

<sup>1</sup> [CPH Guide to Abuse Reporting Practices](#)

<sup>2</sup> The [Abuse Contact Information](#) (ACID) can be used for finding abuse contacts for other than the sponsoring Registrar. However, the Registrar reseller, hosting provider or Registrant may NOT be identified using this tool. Further - the ICANN obligations to mitigate is not stated by these entities.