

# Comment on Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations



AFNIC Public Comment

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AFNIC would like to thank ICANN for the opportunity to share comments on the proposed Amendments to the Base Generic Top-Level Domain (gTLD) Registry Agreement (RA) and Registrar Accreditation Agreement (RAA) to Modify DNS Abuse Contract Obligations.

**Scope.** DNS abuse is a significant concern for internet users and technical operators. A clarified scope is a premise to tackling what we are trying to mitigate and these amendments to the Base gTLD RA and RAA are a welcome development.

**Confirmation of reporting.** The obligation to provide a confirmation of reporting to the notifier is a useful addition and improve trust and transparency of the process.

**Actionable evidence.** The expression “actionable evidence” used in the gTLD RA (point 4.2) and in the gTLD RAA (point 3.18.2) could be further clarified to ensure a consistent and effective application i.e. sufficient information to investigate the reported abuse and take appropriate action.

**Responsibility and accountability.** The adoption of these amendments by contracted parties would be an achievement of ICANN's multistakeholder model of policy development and foster responsibility. It would also demonstrate ICANN's capacity to develop binding rules and accountability.