

# iQ Public Comment to Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations

## Executive Summary

iQ welcomes and supports the proposed amendments to the gTLD Registry Agreement and Registrar Accreditation Agreement.

## About iQ

iQ is a Norwegian registered company that specializes in domain abuse and reputation management services.

iQ's client base includes Registry Operators, Registrars, Hosting providers and entities in the domain name and internet infrastructure industries seeking to monitor and manage their namespace for suspicious behavior including DNS Abuse.

iQ has developed industry leading solutions for monitoring and mitigation of DNS abuse, including iQ [Abuse Manager](#), iQ [AbuseScan](#) solutions and iQ [AbuseStats](#).

## Proposed improvements to the RA

iQ welcomes the proposed change of the terminology 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 defined types of DNS abuse.

In our view, the new **RA SPECIFICATION 6 (REGISTRY INTEROPERABILITY AND CONTINUITY SPECIFICATIONS)** is a highly welcome addition to the base Registry Agreement. The proposed Registry Agreement Specification 6.4.2 and the ICANN Advisory will set the operational tasks for the Registry Operator and ICANN Compliance in a clear context and thereby enforceable.

# 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>. iQ supports the mitigation paths in general. Based on our experience, a Registrar reseller, hosting provider or registrant is hard to find due to privacy legislation<sup>2</sup>, hence the sponsoring registrar abuse contact may be the only known contact.

Due to this, iQ recommends adding to the RAA 3.18.1 **or** the “ICANN Advisory - DNS Abuse Amendments” **requirements to the Registrar to forward received abuse reports to the responsible 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 understand that the RAA 3.18.2 and the ICANN Advisory - DNS Abuse Amendments will give ICANN Compliance the needed mechanism to manage Registrars who are not in compliance with the RAA.

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

iQ supports the added RAA 3.18.2 section.

## ICANN Advisory - DNS Abuse Amendments

*Based on the webinar (May 30, 2023), the ICANN Advisory is the “check list” ICANN Compliance will use in investigation of DNS Abuse compliance cases.*

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

<sup>2</sup> The [Abuse Contact Information](#) (ACID) tool 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. Furthermore, the ICANN obligation to mitigate DNS abuse applies to the accredited Registries, and they should be ultimately responsible for any mitigation.

The ICANN Advisory - DNS Abuse Amendments MUST be seen as a supplement to the proposed updates to the Registry Agreement and Registrar Accreditation Agreement.<sup>3</sup>

iQ would like to comment on some of the recommendations given in the ICANN Advisory - DNS Abuse Amendment.

### RAA 3.18.1: Confirmation of Receipt of a Report of Abuse

The ICANN Advisory - DNS Abuse Amendment describes the process to be followed by the Registrar to confirm receipt of a DNS Abuse report.

iQ recommends that the ICANN Advisory also include requirements for Registrar to enable a system for response to the Reporter that makes the Reporter able to identify the submitted case. For example, including a ticketing number in combination with the reported domain name(s) in the subject field will make it easier for the Reporter to give additional information etc.

### RAA 3.18.2: After Actionable Evidence, Prompt Action Is Required

*In these situations, a registrar might elect to provide notification to the registrant, site operator, and/or web host.*

The above guidance is of importance and sets obligations for the registrar to investigate registrant, site operator and/or web host. Based on iQ's experience, the Registrar often requests the Reporter to contact the site operator and/or web host. In our view, the ICANN Advisory - DNS Abuse Amendment should **emphasize that it is also within the Registrar's contractual obligation to inform their reseller, site operator and/or web hosts**, within a reasonable timeframe following receipt of the report, hence the Reporter should trust the Registrar to forward the notice if needed.

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<sup>3</sup> Jamie Hedlund, ICANN. Zoom chat on GAC discussion on DNS Abuse ICANN 77:

If the amendments are approved, they will (be) incorporated into the relevant agreements. At that point, the obligations become enforceable, and, as with all obligations in the agreements, ICANN Compliance will have the authority to ensure that any failures to comply with the obligations are cured. If at the conclusion of an enforcement process a contracted party fails to cure a violation, Compliance has the authority to suspend or terminate the relevant agreement with the contracted party.

# Additional comments

## Use of webform

Using a webform for reporting abuse to a Registry Operator or an ICANN Accredited Registrar is of value for end-users reporting suspicious behavior. However, a Registry Operator or a Registrar should make it possible for reporting using an email address as well.

## Dedicated abuse PoC for Registry Operators and Registrars

The updated RAA 3.18.3 requires the Registrar to have a dedicated email address for reports from *Law Enforcement Agencies (LEA) and other authorities within the registrar's jurisdiction previously described in Section 3.18.2.*

Registry Operators with a proactive approach to act on DNS Abuse will often use third party services like iQ Abuse Manager<sup>4</sup>. In light of the proliferation of the presence of external parties, iQ highly recommends that Registry Operators and Registrars enable a dedicated email address for “trusted parties” to directly report evidenced cases.

## Conclusion

As mentioned earlier in this comment, iQ Global welcomes the proposed amendments for the RA and RAA. In our view, in addition to the work Registries and Registrars are already doing to combat DNS Abuse, the proposed amendments are a great step forward. We believe that the entire infrastructure community needs to work together to reduce the impact of DNS Abuse, and we would like to support the proposed changes.

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<sup>4</sup> See <https://abusemanager.com>