

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

Namecheap, Inc. (Namecheap) is a leading domain name registration and web hosting company, and the second largest ICANN-accredited registrar with over 17 million domain names under management. Namecheap welcomes the opportunity to provide a comment on the proposed amendments, which is hoped could significantly reduce DNS Abuse.

As a signatory to the DNS Abuse Framework<sup>1</sup>, Namecheap is a leader in efforts to address DNS Abuse. Namecheap's abuse team processes over one million abuse complaints annually<sup>2</sup>, and among the world's largest registrars, Namecheap has been consistently the fastest to mitigate DNS Abuse according to DNSAI Compass data.<sup>3</sup> Namecheap supported the DNS Abuse negotiations, and was part of the Registrar Stakeholder Group (RrSG) negotiation team.

Namecheap supports the DNS Abuse amendments and draft advisory, and encourages the ICANN Community to support the amendments and advisory in their current form. During ICANN77, several ICANN constituencies indicated a desire to provide feedback and changes to the draft advisory. Any proposed feedback or changes should serve to guide future policy work within the ICANN Community. The voting process to approve the RAA amendments is a complicated process, and ICANN drafted the advisory to ensure full support of the RrSG and the Registries Stakeholder Group (RySG) negotiation teams. Any changes to the advisory could result in less support from registrars and registries, potentially jeopardizing the likelihood of approval by the registrars and registries.

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<sup>1</sup> <https://dnsabuseframework.org/>

<sup>2</sup> <https://www.namecheap.com/blog/our-fight-against-fraud-and-abuse-an-update/>

<sup>3</sup> See transcript of ICANN76 Session "GNSO: CPH DNS Abuse Outreach" (at <https://icann76.sched.com/event/1J2J1/gnso-cph-dns-abuse-outreach>)

In addition to the feedback in this comment, Namecheap supports the comments provided by the RrSG<sup>4</sup>, the Internet & Jurisdiction Policy Network<sup>5</sup>, CleanDNS Inc.<sup>6</sup>, the i2Coalition<sup>7</sup>, Tucows<sup>8</sup>, and the Registries Stakeholder Group (RySG)<sup>9</sup>

Sincerely,

Owen Smigelski  
Head of ICANN Policy and Relations  
Namecheap, Inc.

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<sup>4</sup> <https://www.icann.org/en/public-comment/proceeding/amendments-base-gtld-ra-raa-modify-dns-abuse-contract-obligations-29-05-2023/submissions/rrsg--07-07-2023>

<sup>5</sup> <https://www.icann.org/en/public-comment/proceeding/amendments-base-gtld-ra-raa-modify-dns-abuse-contract-obligations-29-05-2023/submissions/de-la-chapelle-bertrand-14-06-2023>

<sup>6</sup> <https://www.icann.org/en/public-comment/proceeding/amendments-base-gtld-ra-raa-modify-dns-abuse-contract-obligations-29-05-2023/submissions/bedser-jeffrey-18-07-2023>

<sup>7</sup> <https://www.icann.org/en/public-comment/proceeding/amendments-base-gtld-ra-raa-modify-dns-abuse-contract-obligations-29-05-2023/submissions/i2c-internet-infrastructure-coalition-14-07-2023>

<sup>8</sup> <https://www.icann.org/en/public-comment/proceeding/amendments-base-gtld-ra-raa-modify-dns-abuse-contract-obligations-29-05-2023/submissions/tucows-13-07-2023>

<sup>9</sup> <https://www.icann.org/en/public-comment/proceeding/amendments-base-gtld-ra-raa-modify-dns-abuse-contract-obligations-29-05-2023/submissions/rysg-registries-stakeholder-group-13-07-2023>