



Public Comment on Proposed Amendments to the Base gTLD RA and RAA to Augment DNS Abuse Contract Obligations

The Internet Infrastructure Coalition (i2Coalition) appreciates the opportunity to comment on the Proposed Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations.

The i2Coalition's diverse membership represents both large and small Internet infrastructure providers such as web hosting companies, software services providers, data centers, registrars, and registries. The i2Coalition has several key goals within ICANN, but chief among them is continuing to build a voice for underrepresented parts of the Internet ecosystem—in particular: web hosts, data centers, and cloud infrastructure providers—and ensuring that accountability and transparency are paramount. The i2Coalition brings unique representation to ICANN as it comprises companies representing the broad ecosystem of Internet infrastructure companies.

i2Coalition is in full support of the proposed amendments presented as a welcome and important step in the ongoing fight against DNS Abuse. We urge their adoption as written. They provide important clarifications on definitions, scope, and responsibilities as well as on implementation.

We believe that a clear and concise definition of DNS Abuse, as presented in the proposed amendments, has been sorely needed: “malware, botnets, phishing, pharming, and spam (as a delivery mechanism for other types of DNS Abuse).” Further, the obligation to confirm receipt of an abuse report in the Registry and Registrar agreements is crucial for the ecosystem. Conversely, the setting of the threshold for “reasonably necessary” and “appropriate mitigation action” as “meaningful evidence” is

a useful clarification for both the level of completeness required of a report and for the careful consideration of the actions needing to be taken, considering the very limited scope of action available. Finally, the inclusion of the possibility of web forms instead of providing email addresses in regard to reporting DNS abuse is a welcomed improvement, as email ironically can serve as an enabler of abusive reporting.

We believe that it is crucial for these amendments to be adopted, as they are the best way for the community to demonstrate its commitment and willingness to take action on DNS abuse.