CleanDNS Comment on the Preliminary Issue Report on a PDP on DNS Abuse

Introduction

CleanDNS welcomes the opportunity to comment on the Preliminary Issue Report on a Policy Development Process (PDP) on DNS Abuse. As a provider deeply engaged in DNS abuse mitigation, we support the GNSO Council's focus on closing persistent gaps in the DNS abuse lifecycle and appreciate the report's data-driven, consultative approach.

General Support

We strongly support the report's prioritisation of two key issues for early policy development:

- Associated Domain Checks
- Unrestricted API Access for High-Volume Registrations

Both are critical to reducing abuse at scale and are directly relevant to the operational realities faced by CleanDNS and our partners. For overall impact to the reduction of DNS abuse and online harms we believe that Associated Domain Checks should be the priority effort as it will have the more significant impact across the industry while continuing to counter act the malicious actor's ability to adapt.

Comments on Priority Issues

1. Associated Domain Checks

Malicious actors rarely operate a single domain. Requiring registrars to investigate other domains linked to a customer and associated accounts. Confirmed abusive activity on any account, should be considered an essential trigger for further review and subsequent disruption of any coordinated abuse campaigns via a pivot.

This "pivot" approach is already best practice among many of CleanDNS' clients and should be standardized as an effective anti-abuse model. It will reduce abuse uptime and limit the effectiveness of bulk registration by bad actors.

Scope and Feasibility: Any obligations should be scoped to ensure it is practical for both retail and wholesale registrars, with clear criteria for what constitutes “association” (e.g., account ID, email, payment method, account access).

2. Unrestricted API Access

The report correctly identifies that ungated API access enables malicious actors to automate large-scale domain registrations, facilitating phishing, malware, and botnet campaigns. CleanDNS’ own data tends to validate that Registrars that allow for bulk registration have higher abuse rates for malicious domain registration.

Policy Recommendation: We support the introduction of proportionate, risk-based friction for new or untrusted accounts before granting access to high-volume registration tools. This friction should be based on customer activity (e.g., account age, abuse history), not just identity, to avoid unnecessary barriers for legitimate users.

Implementation Nuance: The policy must distinguish between retail and wholesale API access, recognising that most wholesale transactions are API-driven and often governed by reseller agreements. Flexibility is needed to avoid unintended disruption to legitimate business models while provide the right amount of due-diligence to API access.

Additional Observations

Associated Domain Checks: While registrars have greater oversight of data which could indicate malicious registrations at scale, registries also have an ability to identify patterns that occur at the TLD level but are spread across multiple registrars.
DGA Coordination: While we agree that centralised coordination for DGA-based botnet mitigation is urgent, we concur with the report’s suggestion that

this may be best addressed through community best practices and voluntary frameworks, rather than consensus policy at this stage.
Data, Transparency, and Metrics: CleanDNS encourages the PDP to recommend robust data collection and transparency requirements, including metrics for policy effectiveness and regular review of abuse trends.
Human Rights and Due Process: Any new obligations must be balanced with registrant rights, including clear recourse mechanisms for mistaken suspensions and proportionality in enforcement.

Individual PDPs vs. Phased PDP
We believe that overly complex or multi layered PDPs should not be sought in this instance. Each of these issues are individual and singular, and should be treated as same to reduce complexity, and most importantly the potential length and delay in achieving workable consensus policy. We also believe that a phased PDP approach would lead to unnecessary delay, in further bolstering anti-DNS abuse actions. As such these PDPs should be individual, each being grounded by a clear charter and we are supportive of ensuring such PDPs are narrowly scoped. We would also advocate for strong GNSO oversight to prevent mission creep, ensuring a fast, effective and agreeable outcome of the PDP processes.

Recommendations
We support two narrowly scoped, PDP's focused on the two priority issues.
Ensure policy language is operationally clear and allows for implementation flexibility, especially for wholesale models.
Mandate regular review and data-driven evaluation of policy effectiveness, with input from contracted parties and the broader community.
Encourage continued development of best practices for areas not yet ready for consensus policy, such as DGA coordination.

Conclusion

CleanDNS commends the GNSO Council and ICANN staff for a thorough and balanced Preliminary Issue Report. We urge the Council to proceed with two PDP's on the two priority issues, ensuring that new policies are practical, enforceable, and proportionate. CleanDNS stands ready to contribute operational expertise and data to support this important work.