

ICANN | GAC

Governmental Advisory Committee

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Governmental Advisory Committee Comments on the Preliminary Issue Report regarding DNS Abuse

These GAC comments are proposed in response to the [ICANN Public Comment proceeding](#) on “Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation” opened on 8 September 2025 and closing on 18 October 2025.

Introduction

The ICANN Governmental Advisory Committee (GAC) welcomes the opportunity to provide comments on the [Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation](#) (Issue Report).

The GAC has focused on DNS Abuse as a matter of public policy priority and discussed the issue for years. The GAC’s positions are reflected in several statements, including its [Statement on DNS Abuse](#) (18 Sep. 2019) and its [Comments on the Amendments to the Base gTLD Registry Agreement \(RA\) and Registrar Accreditation Agreement \(RAA\) to Modify DNS Abuse Contract Obligations](#) (17 July 2023). The GAC provided Consensus Advice on policy development related to DNS Abuse to the ICANN Board in the [ICANN83 GAC Prague Communiqué](#) (16 June 2025). Taking these discussions and outcomes so far into consideration, GAC members have reviewed the Issue Report, as well as the Preliminary Charter, and herein provide general comments.

The GAC recognizes and appreciates the accelerated work by the members of GNSO DNS Abuse Small Team to provide the foundations for the Issue Report, and thanks ICANN staff for their timely work on drafting the Issue Report and Preliminary Charter.

The GAC supports the two issues identified for Policy Development Processes (PDPs) in the Preliminary Charter – Unrestricted Application Programming Interface (API) access for high-volume registrations and Associated Domain Checks – and recommends that chartering of the PDP(s) be constructed in such a way that it prioritizes concrete results before the next round of generic Top-level domains (gTLDs). The GAC is planning its engagement in the PDP(s) and looks forward to working with the community towards consensus policy to help mitigate the impact of DNS Abuse upon the public.

Position of the GAC on the Issue Report and Preliminary Charter

Mitigating DNS Abuse has been one of the top priorities for the GAC. Building on the work of the past years and taking into account ongoing community efforts, at ICANN83, the GAC advised the ICANN Board to *“urge the GNSO Council to undertake all necessary preparations prior to ICANN84 towards starting targeted and narrowly scoped Policy Development Processes (PDPs) on DNS Abuse issues, prioritizing bulk registration of malicious domain names and the responsibility of registrars to investigate domains associated with registrant accounts that are the subject of actionable reports of DNS Abuse.”*

GAC Comments on the Issue Report

The GAC views the Issue Report as an important contribution to discussions within the community, enabling better communication between stakeholders with different backgrounds, as well as a solid understanding of the subject matter. The Issue Report is well-organized, comprehensive, and conducts a holistic analysis.

The GAC appreciates that the Issue Report prioritizes the issues specified for policy development by the GAC in its ICANN83 Consensus Advice. The Issue Report also identifies and explains a variety of additional “policy gaps” underlying DNS Abuse within ICANN’s remit. Many of these gaps were identified by the GAC in its contribution to the public comment process in 2023, at the time of the proposed contract amendments.

To the extent possible, the Issue Report should identify possible paths to address these gaps, whether through further policy development, or through non-binding efforts (e.g., sharing best practices) and cooperation between relevant communities (e.g., limited coordination on Domain Generation Algorithm (DGA)-based abuse). Priority issues for the GAC include:

- **Proactive monitoring as part of preventative measures** (see gaps “P6. Challenges in Real time Detection of Short Lived Abuse” p.15 of the Preliminary Issue Report, and “P7. Underuse of Predictive Algorithms for Early Detection” p.16);
- **Addressing registration data accuracy** (see gaps “P2 and P3: Lack of proactive/Timely contact verification” which recall the recommendation of the GNSO Small Team on accuracy of registration data; and “P8. No Post-Registration Identity Checks for Suspicious Activity);
- **Increased transparency in the reporting obligations** (see gap “C1. Limited Transparency in Mitigation Actions” p.23);
- **Consensus policy on subdomain abuse** (see gap C4 “Unregulated subdomain abuse” p.26)
- **Centralized coordination mechanism for DGA Botnet attacks** (see gap CC1 “Lack of Coordination during Domain Generation Algorithm (DGA) Botnet Attacks” p. 32)

Hence, the GAC suggests that the report include further proposed actions for the gaps that are not currently prioritized for policy development. Prioritizing several issues to be addressed in the near future is reasonable for swift implementation of countermeasures against DNS Abuse.

GAC Comments on the Preliminary Charter

The GAC supports the two issues identified for Policy Development Processes (PDPs) in the Preliminary Charter – *Unrestricted Application Programming Interface (API) access for high-volume registrations* and *Associated Domain Checks* and offers no change to the proposed scope. The GAC emphasizes that, as a general matter, PDP outcomes should remain business model agnostic. Registrars operate under a range of business models, and it is important that future policies be reasonably applicable and enforceable across the global market.

Packaging and Sequencing should prioritize the swift conclusion of Policy Development

The Preliminary Charter packages two issues into one Policy Development Process. In its ICANN83 Consensus Advice, the GAC supported “*targeted and narrowly scoped Policy Development Processes (PDPs) on DNS abuse*”¹. The GAC recognizes the opinion that two separate PDPs, each with its own charter and a narrow scope, as opposed to one PDP with a broader scope, would better fit the expectation of targeted and narrowly scoped PDPs. **The GAC favors the approach that has the most chances to “achieve results according to shorter timelines”² and recommends gathering opinions from stakeholders during the upcoming ICANN meeting.**

Should sequencing be necessary, **the GAC suggests beginning with *Associated Domain Checks* because its scope and charter questions appear to be narrower than those involved in the *API* issue. A narrower scope should lead to a more straightforward path for the ICANN community to consensus.** The GAC appreciates that some concerns have been raised within the GNSO regarding this issue and expects these and other concerns to be discussed and addressed during the PDP process.

Chartering of the PDPs should ensure that whichever topic is addressed first, the implementation of its resulting policy is not dependent upon the issues involved in the other topic.

Additionally, the GAC encourages engagement of ICANN compliance from the very beginning of discussions, in order to ensure that policies developed contemplate enforcement from the outset.

Process and Participation

The GAC would welcome further information prior to the development of the final Charters about the PDP meeting processes and whether, for example, in-person meetings could be scheduled adjacent to regular ICANN meetings (e.g. ICANN85 and ICANN86) in addition to regular virtual meetings, to accelerate progress.

The GAC recognizes that engagement in PDPs can impose a significant workload upon participants. To ensure that the GAC’s interests are adequately represented in these PDPs, the GAC requests that the Charters provide for the GAC to appoint **alternates** in addition to members.³

¹ See section V.1 in the [ICANN83 GAC Prague Communiqué](#) (16 June 2025)

² See Rationale of the GAC Consensus Advice to the ICANN in the [ICANN83 GAC Prague Communiqué](#) (16 June 2025)

³ This approach has been taken in previous PDPs. See the charter for the Temporary Specification for gTLD Registration Data Expedited Policy Development Process Team, available at: [temp-spec-gtld-rd-epdp-19jul18-en.pdf](#).

Timing

As mentioned in the rationale section of the GAC's ICANN83 Advice, the GAC places importance on implementing countermeasures against DNS Abuse in a timely manner and before the delegation of new strings by the New gTLD next round. Initiating PDPs promptly is an essential and responsible step for the ICANN community to take ahead of the new round of gTLDs, to help mitigate the harm caused to the public by DNS Abuse.

To make the forthcoming PDPs more predictable, and to accelerate efforts on DNS Abuse mitigation, **the final Charters should include a specific timeline for policy development and implementation** and include milestones for PDPs so that all stakeholders can track whether necessary efforts are proceeding as scheduled.

Closing

The GAC is grateful to ICANN org for this opportunity to share its perspective on the *Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation* and looks forward to contributing to continued community discussions and the acceleration of the PDPs.