

2025-10-17

Re: Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation

The NetBeacon Institute would like to thank the GNSO and ICANN staff for their excellent work on the 'Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation'. In our view, the report was produced swiftly, is comprehensive yet concise and sets the GNSO and the wider ICANN community on a path towards success. As detailed in the Issue report, these topics have been raised by many areas of the ICANN community and the issues report consolidates years of discussion.

Below, we make a number of process and content suggestions that we hope will be helpful. We also make formal our offer of assistance, should the GNSO find our insights beneficial.

Overall, we want to highlight how we believe this work builds on the abuse focused contractual amendments that came into effect last year. Those amendments create clear obligations to mitigate individual cases of reported DNS Abuse. However, in the course of Institute's work, we see DNS Abuse occur in large-scale campaigns that existing obligations appear inadequate to address. The PDP proposals in the preliminary issue report capture careful moves towards mitigating DNS Abuse at the scale at which it occurs. By creating obligations around associated domain names, and tools that enable high-speed, high-volume registrations we can begin to address DNS Abuse closer to the scale at which it's created.

Comments on the Preliminary Issue Report, specifically Annex A, the Preliminary Charter:

Re: A Single vs. Multiple PDPs

The Institute is of the view, that while there may be efficiencies to be found in conducting a single PDP with distinct phases, that multiple sequential PDPs would be preferable. ICANN, and the ICANN community need to be able demonstrate that the PDP process, and by extension, the multistakeholder model works. We need to show to external audiences that we took up an issue, studied it, worked through solutions, and adopted them without having to elaborate on phases or other ICANN-insider esoterica.

Re: PDP Ordering

The Institute believes that the 'associated domain check' would be the most impactful PDP as it relates to reducing abuse, as well as the most likely to succeed in the least amount of time, and as such suggests that it should be initiated first. Related to the above, and building on previous Institute inputs to the GNSO and ICANN, we think prioritising constrained, targeted work on areas of broad consensus is the best direction.

Re: Part C of the Membership Criteria, pg 56/57

The NetBeacon Institute does not expect nor think it appropriate for it to participate in any DNS Abuse related PDPs as participants. However, section C proposes a role for Expert Contributors¹, and we believe we would have much to offer here. The Institute would like to offer its support to the PDP, however we can be of assistance, and like all of our services, for free.

We have at our disposal insights and data from both our NetBeacon MAP and NetBeacon Reporter projects. This includes nearly 4 years of measuring DNS Abuse across the industry. We have also sent hundreds of thousands of DNS Abuse reports to hosts, registrars, and registries, measured mitigation rates by both reporter and report recipient, and examined thousands of individual abuse reports. Given the volume of references to our work in the Preliminary Issues Report, it would seem sensible to have us engaged where necessary, and we'd be pleased to help assist in data-driven policy development.

Thank you to ICANN Staff and Community for the opportunity to provide these comments.

Regards,

Graeme Bunton,
Executive Director,
NetBeacon Institute

¹ As does the Section 10, paragraph 2 of the [ICANN PDP Manual](#).