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AT-LARGE ADVISORY COMMITTEE
ALAC Statement on the Preliminary Issue Report on a Policy Development
Process on DNS Abuse Mitigation

Preamble

On 08 September 2025, the Public Comment proceeding opened for the Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Consolidated Policy Working Group reviewed the Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

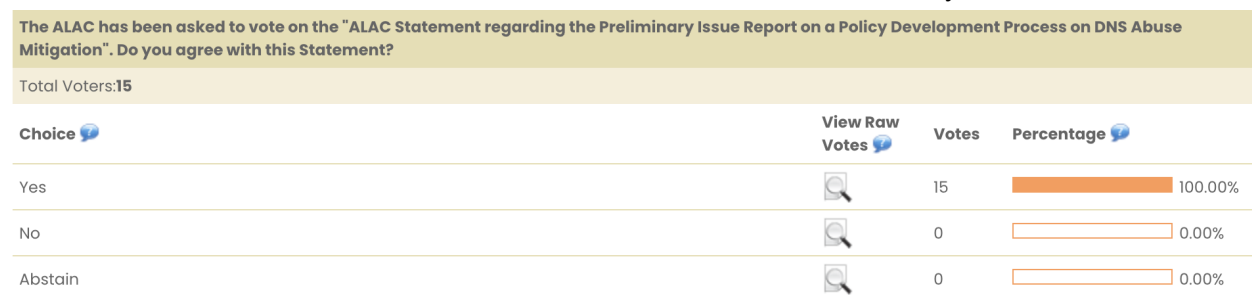
Preamble.....	1
Ratification Record.....	1
ALAC and At-Large Community Comments.....	2
Unrestricted API Access.....	2
Associated Domain Checks.....	3
End-User Impact.....	3

Ratification Record

On 08 September 2025, the Public Comment proceeding opened for the [Preliminary Issue Report on a Policy Development Process on DNS Abuse Mitigation](#). On 01 October 2025, the Consolidated Policy Working Group (CPWG) discussed the comments for an ALAC statement. The CPWG decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. Denise Hochbaum, Eduardo Diaz, Eunice Alejandra Pérez Coello, Gopal Tadepalli, Hadia Elminiawi, Joseph Budu, Natálie Terčová, and Thoko Miya volunteered to draft the initial ALAC statement for CPWG consideration and ALAC endorsement.

On 08 October 2025, the draft statement was shared with the CPWG for review and input. On 13 October 2025, the At-Large Public Comment Statement was finalized. The ALAC Chair, Jonathan Zuck, requested that the Public Comment Statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

On 16 October 2025, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor. 0 votes against, and 0 abstentions. Please note 100% of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Aziz Hilali, Bukola Oronti, Claire Craig, Eunice Alejandra Perez Coello, Emilia Zalewska-Czajczynska, Jonathan Zuck, Judith Hellerstein, Justine Chew, Kathleen Scoggin, Lilian Ivette De Luque, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu, Shah Zahidur Rahman. You may view the results here:



ALAC and At-Large Community Comments

The ALAC and At-Large community welcomes the opportunity to provide input on the Preliminary Issue Report on DNS Abuse Mitigation. Internet end users are the primary victims of DNS abuse, facing fraud, identity theft, financial loss, and other serious harms. For this reason, we emphasize that user protection and the public interest must remain central in framing and scoping any subsequent PDP.

Building on this perspective the ALAC/At-Large proposes the following charter question to guide a future PDP in addressing the two prioritized gaps - Unrestricted API Access and Associated Domain Checks. These questions aim to ensure effective, balanced, and transparent approaches to DNS abuse mitigation that protect end users, uphold the public interest, and strengthen trust in the DNS.

To operationalize these principles, the ALAC/At-Large recommends adding the following questions to the charter:

Unrestricted API Access

- **How should enforcement effectiveness be measured?** Use whatever final criteria are defined for friction to assess mitigation effectiveness. This ensures the policy is evidence-based rather than driven by intuition or proprietary logic.

- **What consumer-notice and expedited appeal requirements must apply?** Require consumer notice and expedited appeal when API access is limited or revoked, to protect legitimate users from unfair or opaque restrictions.
- **What safeguards must be established?** Embed procedural safeguards (e.g. audit trails, independent review) to prevent misuse of enforcement authority and preserve trust in DNS governance.
- **Who is responsible and how to coordinate?** Define roles and coordination. For example, who undertakes detection, and how registrars and registries cooperate, to avoid gaps or overlap in enforcement.

Associated Domain Checks

- **How should enforcement effectiveness be measured?** Use whatever final criteria are defined for association as indicators of abuse. This ensures the policy is evidence-based rather than driven by intuition or proprietary logic.
- **What consumer-notice and expedited appeal requirements must apply?** Require consumer notice and expedited appeal when enforcement is applied, so registrants are not unfairly penalized by opaque decisions.
- **What safeguards must be established?** Embed procedural safeguards (audit trails, independent review) to guard against misuse and maintain accountability.
- **Who is responsible and how to coordinate?** Define roles and coordination. For example, who undertakes detection, and how registrars and registries cooperate, to avoid enforcement gaps or duplication.

On the aspect of the proposed Representative Working Group Model: while we do not disagree with the efficiency and effectiveness of such a model in facilitating community consensus on policy recommendations, we are concerned that a purely Representative Model could lock out experts who are not part of current ICANN AC/SOs/C/SG groups. For that reason, we recommend a Representative + Open Working Group Model should be used.

End-User Impact

The ALAC/At-Large stresses that DNS abuse disproportionately harms Internet end users via fraud, identity theft, and financial loss. Policy decisions must always prioritize the public interest and user protection. Every proposed safeguard, metric, or enforcement mechanism should be judged by its impact on end users, especially non-technical ones. At the same time, policies must be strong enough to deter malicious actors and preserve trust in the DNS.

We look forward to next steps by the GNSO, eventually to participate in any PDP in addressing the present two prioritized gaps, as well as to seamlessly advance the list of other prioritized gaps mentioned in the report.