

30 November 2022

RE: RySG – RrSG Communication on DNS Abuse Disruption/Mitigation Obligations

Ashley Heineman
Chair, Registrar Stakeholder Group

Samantha Demetriou
Chair, Registries Stakeholder Group

Dear Ashely and Samantha,

Thank you for the 4 November 2022 [letter](#) regarding the intentions of the Registrar Stakeholder Group (RrSG) and Registries Stakeholder Group (RySG) to pursue enhancements to the DNS abuse obligations contained in the Registrar Accreditation Agreement (RAA) and Base gTLD Registry Agreement (RA), collectively, the “Agreements.”

We appreciate the RySG and RrSG’s leadership on the important topic of DNS abuse in the ICANN community. As you point out, while the data shows that the number of names being reported as being used for [DNS abuse has declined](#) over the last several years thanks to the many activities of ICANN and the contracted parties, it is still an issue that can benefit from focused improvements to the Agreements.

We support the proposal to improve the Agreements and to establish a meaningful baseline obligation for contracted parties to take reasonable and appropriate action to disrupt or mitigate DNS abuse. As you suggest, we expect this will provide the needed clarity for contracted parties and will aid in enforcement efforts by ICANN’s Contractual Compliance for those registrars or registries who fail to take actions to adequately address DNS abuse. Furthermore, we are aligned on the proposed guideposts outlined in your letter for any negotiations. We welcome action by the RySG and RrSG to initiate the contractual amendment processes detailed in the Agreements.

Particularly, it is important that changes to the Agreements enhance the existing DNS abuse obligations. This will ensure we set an appropriate baseline of obligations, then allow the ICANN community the opportunity to discuss and determine if new obligations are required via the open, transparent, multi-stakeholder, policy development process led by the Generic Names

Supporting Organization (GNSO). This is also consistent with our understanding of the recent [recommendations](#) from the GNSO Small Team on DNS abuse.

Thank you for your thoughtful proposal on this important topic. We look forward to an ongoing collaboration to bring meaningful improvements to DNS abuse obligations in the Agreements for the benefit of all Internet users. The ICANN organization team stands ready to participate in contractual negotiations once the contractual amendment processes have been formally initiated by the RrSG and RySG.

Sincerely,



Göran Marby
President and Chief Executive Officer
Internet Corporation for Assigned Names and Numbers (ICANN)