

Note from the DASC re the GNSO DNS Abuse Mitigation PDPs

1. Background

DNS Abuse is a high priority area for every part of the ICANN ecosystem. At ICANN84 there were at least six sessions dedicated to the topic, within the GAC, ccNSO, GNSO and cross-community technical forums.

The ccNSO (via the DASC) contributes to this work, and has built up a strong brand and reputation in the area.

This is due in no small part to the enviable reputation that ccTLDs have for low abuse rates together with innovative and proactive approaches to keeping their namespaces clean and safe for their respective national and international communities.

2. Issue for discussion

The GNSO has recently resolved to launch two PDPs on DNS Abuse Mitigation. The text of their resolution is attached for reference as an Appendix.

The ccNSO (whether via the DASC or otherwise) has the opportunity to participate in the GNSO PDPs. The topic was raised at the last DASC meeting and there were a variety of opinions expressed:

- The expertise and experience of ccTLDs could be a positive and beneficial presence for these PDPs, since many of us already practice as standard what the PDPs are intended to achieve.
- There may be wider benefits for ccTLDs if sound policy in the gTLDs is developed – not least commonality of standards where registrars serve both ccTLDs and gTLDs, plus of course that an effective reduction in DNS Abuse levels will benefit our communities too.
- In terms of supporting ICANN’s multistakeholder approach, we generally tend to try and cooperate and engage with other community members where appropriate. Participating in these PDPs could boost the ccNSO’s profile and reputation, particularly with GAC members who spoke strongly in support of the PDPs at ICANN84.
- In terms of the participation, it was considered that while one option is to join as an observer, to be effective in reality it would be best to join as a voting member of the PDP.
- However GNSO PDPs are highly resource intensive, even in these cases where the PDPs have been narrowly scoped it is estimated that they will each take 18 months and so we are in reality looking at a three year commitment (personnel could change between the two different PDPs as they cover distinct areas). We could have two members in the PDP, and make use of alternates to spread the

workload, but this would nonetheless be a significant resource commitment from our limited volunteer capacity.

- Another factor is that within the ccNSO we resolutely do NOT develop policy in areas such as DNS Abuse, which is reserved for each ccTLD within their respective jurisdiction and national frameworks. This might be an issue with some ccNSO members as marking a departure from our standard practice.
- Not all DASC members were on the call and so we were unable to make a firm recommendation to Council. Some DASC members present were positive about participating whilst acknowledging there were understandable concerns too. For a positive endorsement it was felt that an indication of support from prospective volunteers would be essential.

Appendix – the GNSO DNS Abuse PDP Motion Text

Motion - DNS Abuse Mitigation - PDP 1 and PDP 2

Submitted by: Jennifer Chung

Seconded by: Damon Ashcraft

WHEREAS,

1. The GNSO Council recognizes that DNS Abuse is a longstanding topic^[1] that the GNSO has devoted two Small Teams to in 2022 and 2025;
2. In April 2025, the GNSO Council tasked a Small Team consisting of Council members to consider what policy efforts, if any, the GNSO Council should consider undertaking after considering new data that has been received, since the last DNS Abuse Small Team [Recommendations](#) in 2022;
3. The Small Team delivered its [Report](#), containing 4 recommendations, to the GNSO Council on 4 August;
4. The GNSO Council [requested](#) an Issue Report on DNS Abuse in August 2025 and in doing so, suggested three (3) priority topics that should be included in the Policy Development Process (PDP) on DNS Abuse that is expected to follow the completion of the Final Issue Report;
5. The Preliminary Issue Report was published for [Public Comment](#) on 8 September and received 27 submissions;
6. During [ICANN84](#), the GNSO organised a working session on DNS Abuse to further inform the Final Issue Report and Draft Charter;

7. On 13 November, the Council discussed the proposed updates to the Final Issue Report based on community input and provided further feedback on PDP structure, the WG Model, and Charter Questions/Scope;
8. On 1 December 2025, the [Final Issue Report on a PDP on DNS Abuse Mitigation](#) was delivered to the GNSO Council, which accounted for the Public Comment review process summarized through a [Public Comment Summary Report](#);
9. Informed by the DNS Abuse Small Team`s recommendations, the Public Comment on the Preliminary Issue Report, the ICANN84 DNS Abuse working sessions, and the clear preference for narrowly scoped Policy Development Processes (PDP), the Final Issue Report recommends two separate PDPs on:

a. **Associated Domain Checks:** A framework requiring registrars to proactively investigate domains linked to malicious actors, particularly in cases of high-volume domain registrations used for DNS Abuse campaigns; and,

b. **Safeguards for Application Programming Interface (API) access to new customers:** A proactive approach that seeks to introduce friction for new customer accounts, prior to gaining access to high volume registration tools until trust is established; and,

10. The Final Issue Report further recommends that the PDP on Associated Domain Check be started first, hereafter DNS Abuse Mitigation PDP 1. The PDP on Safeguards for unrestricted Application Programming Interface (API) access, hereafter DNS Abuse Mitigation PDP 2, second, will follow when the Council decides it is an appropriate time taking into consideration the progress and resources needed for DNS Abuse Mitigation PDP 1.

RESOLVED,

1. The GNSO Council adopts the recommendation for two (2) PDPs on DNS Abuse Mitigation and initiates DNS Abuse Mitigation PDP 1 and DNS Abuse Mitigation PDP 2;
2. The GNSO Council requests the formation of a Charter drafting team on PDP 1 to further update the Charter where relevant and present it for a vote by the Council at its next meeting;
3. The GNSO Council requests that the DNS Abuse Mitigation PDP 1 Working Group be convened as soon as possible after the adoption of the Charter in order to fulfill the requirements of this PDP;
4. The GNSO Council will revisit the draft Charter and timing for the commencement of DNS Abuse Mitigation PDP 2 when deemed appropriate

based upon the progress and resources needed for PDP 1. The Council asks staff to find efficiencies where sensible and appropriate in managing the two separate PDPs.

5. The GNSO Council requests that DNS Abuse Mitigation PDP 2 be convened after the Charter is adopted.
6. The GNSO Council thanks the DNS Abuse Small Team, the ICANN Community and everybody who contributed to it for their efforts in moving this important topic forward, with the aim to improve the security and stability of the Internet