

Registries Stakeholder Group Statement



Amendments to the Base gTLD RA and RAA to Modify DNS Abuse Contract Obligations

Date statement submitted¹: 13 July 2023

Reference url:

<https://www.icann.org/en/public-comment/proceeding/amendments-base-gtld-ra-raa-modify-dns-abuse-contract-obligations-29-05-2023>

Background²

ICANN org and the Contracted Party House Negotiating Team (CPH NT), are seeking input from the ICANN community on the proposed amendments to the gTLD RA and 2013 RAA, collectively, the “Agreements.”

The proposed amendments would enhance obligations by requiring registrars and registry operators to promptly take reasonable and appropriate action to stop or otherwise disrupt DNS Abuse.

For the purposes of the proposed amendments, **DNS Abuse means malware, botnets, phishing, pharming, and spam (when spam serves as a delivery mechanism for the other forms of DNS Abuse, namely, malware, botnets, phishing, and pharming)** as those terms are defined in Section 2.1 of the [Security and Stability Advisory Committee Report on an Interoperable Approach to Addressing Abuse Handling in the DNS](#) (SAC115).

The proposed revisions - to RAA Section 3.18 and **RA Specification 6, Section 4** include the following:

- Requirements to ensure abuse contacts are readily accessible on the contracted party’s webpage and to produce receipt confirmation for reporters upon receipt of abuse reports
- Possibility for registrars and registry operators to use webforms instead of email as an abuse reporting mechanism
- A definition of DNS Abuse for purposes of the Agreements
- A new requirement to promptly take appropriate mitigation actions against domains for which the contracted party has actionable evidence demonstrating that the domains are being used for DNS Abuse
- Permits contracted parties (CPs) to exercise reasonable discretion in selecting and implementing the appropriate mitigation actions depending on the circumstances of each case
- Recognition of the different roles of the registrar and registry operator
- Focus on the target outcome of stopping or disrupting the use of gTLD domain names for DNS Abuse

In addition, amendments to **RA Section 11.3 (b)** replace the term security threats with DNS Abuse. This clarifies that registry operators must periodically conduct a technical analysis to assess whether domains in the top-level domain (TLD) are being used to perpetrate DNS Abuse and maintain statistical reports on identified DNS Abuse. A positive benefit of this change is to expand the requirement for Registries to include Spam as a delivery mechanism for other forms of DNS Abuse as something to include their periodic analysis and reports

The [draft ICANN Advisory](#) further explains the new requirements, provides guidance, and sets out expectations for action by CPs to establish compliance.

¹ This is a copy of the text submitted via the ICANN Public comment platform.

² Background: intended to give a brief context for the comment and to highlight what is most relevant for RO’s in the subject document – it is not a summary of the subject document.

Documents

Base gTLD Registry Agreement

- [Proposed Global Amendment to the Base gTLD Registry Agreement \(pdf, 50.74 KB\)](#)
- [Proposed Redline Base gTLD Registry Agreement \(pdf, 741.99 KB\)](#)
- [Proposed Clean Base gTLD Registry Agreement \(pdf, 747.21 KB\)](#)

Registrar Accreditation Agreement

- [Proposed Global Amendment to the Registrar Accreditation Agreement \(pdf, 47.56 KB\)](#)
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Registries Stakeholder Group Comment

The Registries Stakeholder Group (RySG) appreciates and welcomes the opportunity to provide a comment in support of these proposed amendments. Like our colleagues in the Registrar Stakeholder group, whose comment to this process we both support and appreciate, we recognize the significance and importance of these amendments to our agreements with ICANN. We believe they represent a vital step in both our members', and the community's efforts to mitigate and disrupt DNS Abuse.

We are extremely pleased having received the mandate from our membership, to initiate the amendment process on behalf of the RySG, and we are grateful for the collegial and exceptionally collaborative efforts of all parties involved. This is reflected, not only in the strength and quality of the amendments themselves, but also in the pace at which this process was completed. We would like to thank all those involved from our own membership, the RrSG and ICANN who have dedicated their time, efforts and resources to seeking a positive result from this very important process. We would also like to thank and acknowledge those in the broader ICANN community, who have expressed their support for the progression of these vital amendments.

Summary of Submission:

The Registries Stakeholder Group (RySG) appreciates and welcomes the opportunity to provide a comment in support of these proposed amendments. Like our colleagues in the Registrar Stakeholder group, whose comment to this process we both support and appreciate, we recognize the significance and importance of these amendments to our agreements with ICANN. We believe they represent a vital step in both our members', and the community's efforts to mitigate and disrupt DNS Abuse.