

Background

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. The DNS Abuse Small Team, in alignment with community support, recommended narrowly scoped PDP on three issues. The Final Issue Report concluded that all of the three identified priority issues are appropriate for policy development. However, the report suggests that only two of the three identified DNS Abuse Issues should be prioritized for policy development, while one could potentially be addressed more directly and expeditiously outside of the policy development process.

This prioritization reflects where policy intervention could likely reduce DNS Abuse at scale, is broadly applicable across the gTLD space, and aligns with the community input and lifecycle-and-cluster analysis used in the updated Small Team gap matrix.

Informed by the DNS Abuse Small Team's recommendations and the Community's support for a narrowly scoped Policy Development Process (PDP), the Council initiated a PDP on:

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

Threat actors register large portfolios of malicious domains which enables them to launch coordinated phishing or malware campaigns at scale. The Registrar Accreditation Agreement (RAA) currently requires registrars to evaluate individual domain names upon receipt of a DNS Abuse report. When a registrar finds that one domain is malicious, there is no contractual requirement that the registrar must investigate whether the same registrant or account has other active domains that are also being used for similar abuse. Without this requirement, an attacker might only lose one domain at a time, continuing to use the rest until each is individually reported. This current "one-at-a-time" approach limits the mitigation of related domains operated by the same actor, even when those domains are part of an identifiable campaign. If registrars proactively pivot on the information, it could potentially curtail whole campaigns.

GNSO DNS Abuse Mitigation Policy Development Process 1 Questions for Community Input

The scope of work, charter questions, and key issues to consider presented below are contained in the DNS Abuse Mitigation PDP [WG Charter](#).

Work Scope and Charter Questions

Scope of work: This PDP seeks to create an obligation for registrars to investigate other domains associated with a customer account or registrant where at least one domain of that registrant is found to be engaged in DNS Abuse, as defined in the RAA. To develop a Consensus Policy that imposes an obligation on ICANN accredited registrars to proactively investigate associated domain names, and/or related orders when a domain under their management is found to have been registered for malicious purposes. This would specifically exclude domains that have been compromised. By identifying and

acting on malicious domain portfolios - often part of coordinated campaigns - this policy could significantly reduce abuse uptime and disrupt large campaigns used for phishing and other DNS Abuse. The Associated Domain Check would seek to solve a gap by requiring all registrars to cross-check within the registrar's portfolio the known abusive domain(s) to others connected to the same customer account, registrant email address, or other pieces of information. In undertaking its work, the PDP shall consider the existence of different registrar business models. The PDP should ensure that any findings and recommendations it considers are evaluated regarding their practical applicability across diverse registrar environments, and that no assumptions are made that a single approach or implementation model is appropriate for all registrars. This consideration applies across all aspects of the PDP's work and informs the interpretation of each charter question.

Charter Questions:

Initiating Associated Domain Check

1. What triggers the requirement to investigate associated domain names?
2. What criteria should be used to define "association" between domains? What elements can be considered to establish such "association"?
3. Defining "investigation": What constitutes a "reasonable investigation" by a registrar? What investigation steps are required or recommended? Are the criteria for investigation proportionate and necessary? What is the impact of this investigation on domain name registrants?
4. What data access and privacy safeguards are necessary to protect both registrants and registrars during associated domain checks?
5. If the associated domain checks have an adverse impact on domain name registrants, are there corresponding remedies?
6. What are appropriate timelines and thresholds for initiating and concluding the associated domain check?

Demonstrating Compliance

7. What specific requirements are necessary to implement this policy and what parts can be subject to best practices, or potentially left to the discretion of the contracted party?
8. What metrics will be used to evaluate the policy's effectiveness?
9. How can registrars demonstrate their compliance with the obligations to ICANN and what types of evidence and information can registrars submit?

Impact on Human Rights

The WG is expected to consider the potential impact of any recommendations on human rights. Based on the information included in the request for an Issue Report and the Issue Report, the WG is expected to further consider whether there is a likely human rights impact, and if so, who are the groups expected to be impacted and the expected severity of the impact (high / medium / low). If an impact is anticipated, the WG is expected to address the following questions: 1) is the proposed action necessary to achieve the desired outcome, 2) is the proposed action proportionate, 3) is the proposed action legitimate.

Impact on the Global Public Interest

The WG is also expected to consider the potential impact of any recommendations on the Global Public Interest. In order to facilitate this analysis, the WG may wish to consult this checklist and may also benefit from consulting the GPI Toolkit Wiki page.