ICANN | GAC

Governmental Advisory Committee

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GAC Comment on Statistical Analysis of DNS Abuse in gTLDs Report (DNS Abuse Study)

The GAC welcomes the statistical analysis of DNS Abuse conducted in the DNS Abuse Study. Gathering, analyzing, and sharing information on DNS abuse in both legacy and new gTLDs plays a crucial role in maintaining the safety, security, and stability of the domain name system (DNS).

The DNS Abuse Study makes clear that there are significant abuse issues in the DNS. Regarding the new gTLD program, the Study notes that, in the New gTLD Program, over 50% of registrations in certain new gTLDs over 50% abusive. Other highlights of the Study include the following:

- New gTLDs have become a growing target for bad actors;
- Legacy gTLDs have higher concentrations of compromised domains while bad actors frequently choose to maliciously register domain names using one of the new gTLDs;
- The registry operators of the most abused new gTLDs compete on price;
- Phishing and malware abuse rates of new gTLDs are converging with the rates of legacy gTLDs over time;
- Five new gTLDs with the highest concentration of domains used in phishing attacks according to the Anti-Phishing Working Group blacklist contained 58.7% of all of the blacklisted domains in the new gTLDs;
- New gTLDs experienced a significantly higher percentage of spam in the last quarter of 2016 than legacy gTLDs (Legacy gTLDs collectively had a spam-domains-per-10,000 rate of 56.9, while new gTLDs had a rate of 526.6–which is almost ten times higher);
- Abuse counts primarily correlate with strict registration requirements: i.e., bad actors prefer to register domains in standard new gTLDs, which are generally open for public registration, rather than in community new gTLDs, where registries may impose restrictions on who or what entities can register domain names.

The DNS Abuse Study briefly references a finding that certain URLs are used more extensively to distribute child abuse material (a unique domain distributing one image compared to a unique domain distributing hundreds of images). DNS Abuse Study at p. 6. It would be helpful if the report could more clearly explain, elaborate, and/or quantify this statement so that stakeholders can understand to what extent the study examined this issue as well as to inform any potential future policy considerations.

The correlations drawn between stricter registration policies and fewer abuse counts suggest potential areas for future policy development. Accordingly, The GAC supports the completion of all existing reviews of the new gTLD program and its policies before any new subsequent rounds of new gTLDs occur. Information revealed by the DNS Abuse Study and the recommendations set forth in all other reviews of the new gTLD program, particularly the Competition, Consumer Trust and Consumer Choice Review, must inform the policies of subsequent new gTLD rounds. In this context, account should be taken of the evidence in the Report showing that the risk associated with different categories of new gTLDs (Standard or generic gTLD, Community gTLD, Geographic gTLD and Brand gTLD) varies with these categories. It also varies depending on the strictness of the registration policy. There is still significant scope for the development and enhancement of current mitigation measures and safeguards, taking into account the specific risk levels associated with different categories of new gTLDs.

Beyond the specifics of the DNS Abuse Study, which the GAC welcomes, the Study is a clear example showing that ICANN should continue and expand upon the use of statistical analysis and data to measure and share information with the community information about levels of DNS abuse. Consistent with this goal, the Domain Abuse Activity Reporting (DAAR) tool should be considered a primary vehicle to gather and publish such DNS abuse data and statistics. The GAC encourages ICANN to consider how it may incorporate the Study methodology and metrics into this tool, and proposes that ICANN consult with the Study authors to determine whether there are appropriate opportunities for collaboration. Furthermore, the GAC believes that the use of statistical analysis should inform future policies on DNS abuse and further analysis should be done to consider how this information could bolster the efforts by ICANN and its contract compliance and security teams to effectively respond to DNS abuse and better prevent future and repeat abuses.