



Re: Statistical Analysis of DNS Abuse in gTLDs (SADAG) Report

Via Electronic Mail: comments-sadag-final-09aug17@icann.org

September 22, 2017

Google applauds Competition and Consumer Trust Review Team (CCT-RT) for commissioning and supporting the Statistical Analysis of DNS Abuse in gTLDs Final Report ("Report"). Empirical research on the occurrence of abuse in the Domain Name System (DNS) as found in the Report is an important first step to effectively handling it, whether through the development of policies or implementation of tools by individual registries and registrars.

We observed the following from the research put forth in the Report:

- Patterns of abuse occurrence vary according to the type of abuse, with some forms more reliant on the reputation and visibility of a particular domain name and others with the ability to register domains en masse;
- Similarly, practices by registrars and new and legacy gTLD operators are not homogenous leading to uneven distributions of abuse across registries and registrars;
- The introduction of new gTLDs changed the distribution of abuse for forms that rely upon low-cost or high-volume registrations, but left the overall amount of DNS abuse largely unchanged;
- The occurrence of DNS abuse appears to be linked to both price and registry policies/procedures for monitoring for and handling these types of abuse; and, relatedly,
- Unless compensatory mechanism are in place, abuse requiring high volumes of registrations is likely to be attracted to whatever TLDs are cheapest.

We strongly urge the CCT-RT and ICANN community to apply the findings of the report in further research and efforts to address DNS abuse. This may include further segmentation of the existing findings, or additional research into price sensitivity of registrants engaged in various forms of DNS abuse. In order to succeed in reducing the aggregate occurrence of abuse, it may be necessary or more effective to bring additional Internet infrastructure players into the conversation and move beyond a contractual compliance based solution for addressing DNS abuse toward one that is more holistic. The alternative is likely to only perpetuate the current observed tendency for abuse to move between TLDs and registrars while leaving the aggregate occurrence of abuse constant.

We appreciate the research carried out by Delft University of Technology and SIDN Labs and hope for additional constructive research and effort in the space.

Sincerely,

A handwritten signature in black ink that reads "Ben McIlwain".

Ben McIlwain
Registry Tech Lead