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Governmental Advisory Committee

21 February 2022

John Crain, Senior Vice President and Chief Technology Officer, ICANN
Russ Weinstein, Vice President, GDD Accounts and Services, ICANN
Samantha Demetriou, Chair, Registries Stakeholder Group

Subject: Agreement to expand data collection to enable reporting of registrar-level DNS Abuse Activity in DAAR

The Governmental Advisory Committee (GAC) is writing to express its appreciation for both the work done on - and the commitments made to continue to improve - ICANN's Domain Abuse Activity Reporting (DAAR).

As you may be aware, since the Hyderabad meeting¹ the GAC has consistently supported “ICANN’s efforts in setting standards for [DNS] abuse reporting”, recognizing the growing importance of such data to achieve the objectives of the GAC-endorsed Law Enforcement Due Diligence Recommendations², that is “the prevention and disruption of efforts to exploit domain registration procedures” and the facilitation of “effective investigation of Internet related crime.” The GAC has also stressed that “if the public is to trust and rely upon the Internet for communications and transactions, those tasked with administering the DNS infrastructure must take steps to ensure that this public resource is safe and secure.”³ In particular, in response to the CCT Review’s Statistical Analysis of DNS Abuse, the GAC stressed that “the use of statistical analysis should inform future policies on DNS abuse and [...] 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.” In this context, the GAC encouraged ICANN to “continue and expand upon the use of statistical analysis and data to measure and share information with the community” and to consider making DAAR “a primary vehicle to gather and publish such DNS abuse data and statistics”.⁴

¹ See rationale of GAC Advice IV.2.a.i on p.9 in the [GAC Hyderabad Communiqué](#) (8 November 2016)

² The [Law Enforcement Due Diligence Recommendations](#) were referenced in several GAC Communiqués: Nairobi (2010), Brussels (2010), Singapore (2011) and Dakar (2011).

³ See [GAC Statement on DNS Abuse](#) (18 September 2019)

⁴ See [GAC Comment](#) (19 September 2017) on the [Statistical Analysis of DNS Abuse in gTLDs](#) (9 August 2017)

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After numerous discussions within ICANN's multi-stakeholder community, it may be self-evident, yet it bears repeating: conversations on the important topic of DNS Abuse will only benefit from a shared understanding of facts, and to this end the GAC sees DAAR as a critical enabler of productive discussion and engagement. While the launch of DAAR in 2017 was a positive development, even more positive is the effort to continue to improve upon it to meet the needs of the community.

In particular, the GAC is pleased to observe the recent progress toward enabling DAAR reporting to be specific to the registrar level. We note that the Registries Stakeholder Group (RySG)'s engagement with the Office of the Chief Technology Officer (OCTO) involved a willingness to embrace a small but significant contractual change relating to the permissible use of Bulk Registrant Data in ICANN's possession. This is commendable. The GAC read and appreciated the support for such contractual amendments as put forward in the [RySG letter to ICANN](#) (22 October 2021) and the [related ICANN Blog](#) (28 October 2021).

Similarly, conversations between members of the GAC and OCTO have led to cautious optimism that source data used in the generation of DAAR reporting may in the future become available to external parties seeking to replicate or better understand DAAR's findings. The GAC is aware that the sharing of such source data remains a goal, and not yet an achieved outcome, and may require its own contractual updates with data vendors. Nonetheless, the GAC wishes to express its support for the efforts made to achieve this goal, and the spirit of transparency it represents.

Best regards,



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Chair, Governmental Advisory Committee (GAC)