

Government of India comments to ICANN staff report on “New gTLD Program Safeguards Against DNS Abuse”

The GAC welcomes the efforts being put by ICANN staff to prepare report on **“new gTLD Program Safeguards against DNS Abuse”**. We believe that it will strongly aid the work of CCT review team in order to measure the effectiveness of safeguards against DNS abuse under the new gTLD Program. Importantly, the findings and research methodology used in this report, along with the work of CCT Review team will also feed into the ongoing PDP work on “new gTLD subsequent procedures”.

The specific comments on **“new gTLD Program Safeguards against DNS Abuse”** Report are mentioned in the following paragraphs:

1) Comments on Question # 3: How do we ensure more focussed efforts on combating identified abuse?

A) The report should mention possible collaboration with renowned international security organizations like SANS, ISC2, ICANN Security, Stability and Resiliency Team, Interpol Cyber Security cell etc., in order to create awareness w.r.t. new gTLD programme and possibilities of abuse.

2) Comments on Question # 4: How do we provide an enhanced control framework for TLDs with intrinsic potential for malicious conduct?

A) The report should mention that “The analysis to measure the effectiveness of safeguards against DNS abuse should keep in mind the particular risk, threat and business profile of the gTLD in question”. For example the risk profile for .bank and .pharma might be more vulnerable as compared to .music or .amazon

3) Other comments:

A) A reference to following existing and related studies / reports may be included in the Report, for example:

- DNSSEC related Reports from ICANN's SSAC (SAC 26, 29, 30, 35, 63)
<https://www.icann.org/groups/ssac/documents>
- Non-PDP Joint DNS Security and Stability Analysis Working Group Final Report
<https://ccnso.icann.org/workinggroups/dssa-final-08nov13-en.pdf>
