

Subject: **Comments from India: [GAC-pswg] [For Endorsement] Comment on DNS Abuse report**

To: Cathrin.BAUER-BULST@ec.europa.eu, gac@icann.org

Cc: gac-pswg@icann.org, gac-staff@icann.org,
Sanjay Rakesh <sanjay.rakesh@gov.in>

Date: 15/09/17 01:46 PM

From: "T Santhosh" <tsantosh@meity.gov.in>

Dear Cathrin,

The comments from India are as below:

(i) The Report clearly indicates that the risk associated with different categories of new gTLDs (Standard or generic gTLD, Community gTLD, Geographic gTLD & Brand gTLD) varies with these categories, and also varies with strict registration policy and current mitigation measures/ safeguards still have huge scope of development and enhancement. Therefore, there is a need to develop mitigation measures/safeguards separately for each category of New gTLD.

(ii) Mitigation measures adopted by the ICANN or under discussion related to release of two/three character ccTLD, country and territories names at top and second level should also be discussed again in light of this study and other statistics gathered in past couple of years.

Warm Regards

T.Santhosh
Scientist 'E' / Additional Director
Ministry of Electronics and Information Technology
Government of India
Electronics Niketan, 6 CGO Complex,
New Delhi - 110003 (India)
Tel: +91-11-24364741, 24301831

On 07/09/17 05:14 PM, Cathrin.BAUER-BULST@ec.europa.eu wrote:

Dear GAC Members,

Please find attached a draft comment on the **Final Report of the Statistical Analysis of DNS Abuse in gTLDs**, for your review and endorsement, for submission on behalf of the GAC during the public comment period.

The report and its underlying study were commissioned to inform the work of the Competition, Consumer Choice and Consumer Trust Review Team. The report highlights a number of relevant issues for the GAC, specifically with a view to

1. the enforcement of current gTLD policies and safeguards and
2. the development of effective policy for any future gTLD rounds.

In particular, the report notes that, despite the policies already in place, certain new gTLDs contain over 50% abusive registrations. The registry operators of the most abused new gTLDs compete on price, and the five new gTLDs suffering from the highest concentration of domains used in phishing attacks according to the Anti-Phishing Working Group blacklist owned 58.7% of all blacklisted domains in new gTLDs.

For more information on the study and the report, please see here: <https://www.icann.org/public-comments/sadag-final-2017-08-09-en>.

It is proposed that the GAC intervene to provide input on the methodology and to highlight the need for continued and transparent reporting, in line with [previous GAC advice](#) on this issue. The public comment period closes on 19 September. Please submit any comments you may have on the text by 17 September to leave sufficient time for the final editing.

Thank you for your attention and possible input.

Best regards
Cathrin Bauer-Bulst
for the GAC PSWG

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