

Tuesday, August 9, 2022

Mr. Göran Marby
President and CEO
ICANN

Dear Göran,

On behalf of the Brand Registry Group, the association for brands at the top level, we request that you direct ICANN's Office of the CTO (OCTO) to enhance the monthly Domain Abuse Activity Reporting (DAAR) by creating a separate analysis of abuse in Specification 13 TLDs.

Currently, ICANN only delineates abuse activity by comparing legacy versus new gTLDs. We believe ICANN should undertake a separate analysis that specifically measures the level of abuse, or lack thereof, that is currently taking place in Specification 13 TLDs. We expect that identification and aggregation of data from Specification 13 Registry Operators should be very simple for OCTO to compile.

We also respectfully request that ICANN provide historical data to the greatest extent possible so that we can determine any long-term trends or historical issues regarding abuse in Specification 13 TLDs.

As you are no doubt aware, the Specification 13 Registry Agreement requires the Registry Operator to limit domain name registrations to the Registry Operator, its Affiliates, or Trademark Licensees. Additionally, each Registry Operator must sign an annual statement attesting to compliance with this requirement.

Based upon our preliminary calculations and publicly available information, we believe that Specification 13 TLDs have *de minimis* levels of abuse.

We believe this analysis will provide the broader ICANN community with an important data point to measure DNS Abuse and help ICANN to responsibly move forward with any future expansion of the name space in a safe and secure manner. We request that ICANN commit to sharing these numbers with the community in advance of the annual meeting in September 2022.

Should you have any questions or concerns please do not hesitate to contact me.

Best regards,



Crews Gore
President
Brand Registry Group