

27 April 2022

RE: EUROPEAN COMMISSION REPORT ON DNS ABUSE

Mr. Christian Dawson  
Executive Director  
i2Coalition

Dear Mr. Dawson,

Thank you for your [letter dated 7 March 2022](#).

The ICANN Board is aware of the report titled “Study on Domain Name System (DNS) abuse” published by the European Commission (EC). We understand it was commissioned to “assess the scope, impact, and magnitude of DNS abuse, as well as to provide input for possible policy measures on the basis of identified gaps.”

We also note that a recent [report from the ICANN organization](#), which provides insight into the trends of DNS abuse over the last four years, may be of interest to the I2Coalition. This report shows a decline in reported DNS abuse over the last four years. ICANN org’s report utilizes similar methodologies and data sources as the EC’s study, but utilizes a longer time horizon. Despite the decline, DNS abuse is an issue that still requires attention and work in the ICANN community.

The EC study on DNS abuse comes at a time when this important topic is under discussion within the ICANN community. As recognized by both the authors of this study and the I2Coalition, ICANN has a specific remit. The ICANN Bylaws make clear that ICANN’s role does not extend to the regulation of online content, nor beyond the activities specifically recognized. The Bylaws outline that ICANN’s “scope is to coordinate the development and implementation of policies that are developed through a bottom-up consensus-based multistakeholder process and designed to ensure the stable and secure operation of the Internet’s unique names systems.” As such, the ICANN community is best positioned to create policies when it comes to the DNS. It will be up to the community to consider any input it believes would add value into this discussion within ICANN and future consensus policies. The ICANN Board looks forward to the community’s continued discussions about DNS abuse and how best to address it.

You may find ICANN’s [recent input](#) to the Call for Evidence launched by the European Commission (EC) on the European Union’s (EU) Toolbox Against Counterfeiting informative and helpful. We thank you for providing us with your views on this matter.

Best regards,



Maarten Botterman  
Chair, ICANN Board of Directors