

29 June 2023

Re: Bulk registrations

To:

- Ashley Heineman, Chair, Registrar Stakeholder Group
- Alan Woods, Vice-Chair (Admin), Registries Stakeholder Group; Co-Chair RySG DNS Abuse Working Group
- Graeme Bunton, Executive Director, DNS Abuse Institute
- Jamie Hedlund, Senior Vice President, Contractual Compliance & U.S. Government Engagement, ICANN org

Dear Ashley, Alan, Graeme and Jamie,

On behalf of the GNSO Council, I would like to thank you for the [input](#) your respective groups / organizations provided to our [request](#) for further information on the topic of bulk registrations.

The GNSO Council tasked the DNS Abuse small team to review the input provided and report back to the Council accordingly. The small team documented its findings in [this document](#) which the Council reviewed during its 14 June 2023 meeting. The small team concluded that:

“The general responses received were:

- *Complaints from single or multiple registrations are handled uniformly, without clarity on what might constitute bulk registrations warranting targeted reactions.*
- *The lack of a clear definition did not elicit a clear response.*
- *Other Know Your Customer tools are deemed more efficient in detecting potential abuse, and should warrant more attention.*

ICANN’s recently started Inferential Analysis of Maliciously Registered Domains (INFERMAL) project seems to indicate a willingness from the org to look into this matter and provide us with better statistics and intelligence. We have also heard from the colleagues at the DNS Abuse Institute that this could be on their radar.

Our preliminary conclusion has been that this does not fall within the realm of Consensus Policy at the moment. With the understanding that the above does not directly relate to policy, we appreciate the importance of other bodies taking these matters into consideration.”

Based on the small team’s assessment, the Council does not anticipate taking any further action on this topic at this point in time, but should additional or new information become available, the Council may reconsider this conclusion.

Thank you again for your input and willingness to engage with the Council.

Kindly,

Sebastien Ducos
GNSO Chair