



10 May 2016

To: comments-new-gtld-safeguards-dns-abuse-15mar16@icann.org

Re: Draft Report: New gTLD Program Safeguards to Mitigate DNS Abuse

The Endurance International Group, Inc. ("Endurance"), appreciates the work that was put in by various groups to prepare the draft report regarding [New gTLD Program Safeguards to Mitigate DNS Abuse](#) and appreciates the opportunity to submit a public comment.

Endurance supports the community's efforts to define the current state of DNS abuse, evaluate the effectiveness of existing safeguards, and consider additional safeguards to further mitigate certain types of DNS abuse. However, we urge ICANN to consider the scope of this evaluation and associated safeguards.

The working definition of "DNS Abuse"¹ in this draft report is overly broad. The definition, as written, suggests that content could be a consideration for abuse mitigation. Pay-per click advertising and traffic diversion (*see page 6*) are identified as potential forms of registration abuse and are clear examples of content issues. We encourage ICANN to align the definition of "DNS Abuse" with the mission contained in ICANN's Bylaws. ICANN has regularly communicated that, consistent with its mission, it is not a regulator of Internet content. This broad definition includes abuses related to content.

We also encourage ICANN to evaluate how existing safeguards can be assumed or incorporated into this process. Currently, effective safeguards are present in the 2013 Registrar Accreditation Agreement and other contracts, the URS, existing new gTLD policies and practices, and other Consensus Policies. For example, Name spinning (*see page 6*) is addressed in many of these documents. ICANN and the community would be remiss in exploring additional safeguards in these areas without examining existing processes.

Thank you in advance for your consideration.

Sincerely,

The Endurance International Group, Inc.

[PDR Ltd.](#) | [Domain.com, LLC](#) | [Fastdomain Inc.](#) | [BigRock Solutions Ltd.](#) | [LaunchPad Inc.](#)

¹ "DNS abuse" is the term used in this report, and refers to intentionally deceptive, conniving, or unsolicited activities that actively make use of the the (sic) DNS and/or the procedures used to register domain names."