Hello Nathalie & the GNSO Council,

We are pleased to hear that the GNSO Council has found SAC115 of interest as it considers what policy changes it might consider to help guide the community on DNS abuse mitigation.

We would like to note that the SSAC did not recommend particular policies or policy efforts within the ICANN community in SAC115. Our intention in SAC115 was to frame the practical problems relating to the reporting (and mitigation thereafter) of abuse and suggest a general and inclusive model for the handling of abuse reports. Our focus in that document was on one particular set of problems within the wider abuse landscape that extends well beyond the ICANN multistakeholder community.

The SSAC would like to point out some things in SAC115 that could be useful in the GNSO Council's deliberations on potential policy work to address DNS Abuse. In our work we did propose a framework for creating an interoperable response to abuse handling in the DNS and beyond, the elements of which include the following:

- 1. encourage standard definitions of abuse;
- 2. encourage 'notifier programs' that will expedite and make more efficient abuse handling in certain parts of the ecosystem:
- 3. determine the appropriate primary point of responsibility for abuse resolution;
- 4. identify best practices for deployment of evidentiary standards;
- 5. establish standardized escalation paths for abuse resolution;
- 6. determine reasonable timeframes for action on abuse reports; and
- 7. create a single point of contact determination whereby a reporter can identify the type of abuse and get directed to appropriate parties.

The challenge we face together is to make meaningful, collective improvements for the benefit of end users that also acknowledge and embrace our different perspectives, a challenge that it is easier to imagine meeting through continuous and collective engagement than through simple answers to broad questions. The SSAC is interested in engaging with the community on these and other elements.

Cheers,

Rod Rasmussen SSAC Chair