

6 January 2023

**Subject: Bulk Registrations**

**To:**

- Ashley Heineman, Chair, Registrar Stakeholder Group
- Samantha Demetriou, Chair, Registry Stakeholder Group
- Graeme Bunton, Executive Director, DNS Abuse Institute
- Jamie Hedlund, Sr. Vice President, Contractual Compliance, ICANN org

Dear Registrar Stakeholder Group, Registry Stakeholder Group, DNS Abuse Institute and ICANN org,

As you may be aware, the GNSO Council recently adopted the [DNS Abuse small team report](#). The small team was formed to consider what policy efforts, if any, the GNSO Council should consider undertaking to support the efforts already underway in the different parts of the community to tackle DNS Abuse.

One of the topics the small team discussed as part of its deliberations related to bulk registrations. As noted in its report,

“(...) even though there may be evidence of bulk registrations being used for malicious activities, there are also examples in which bulk registrations are used for legitimate purposes (e.g., cybersecurity purposes, brand or governments). It may be difficult to identify objective factors that could flag when bulk registrations may be intended for abusive purposes and there is a risk of impeding bulk registrations for legitimate purposes”.

To further assess if/how bulk registrations play a role in DNS Abuse, the Council is reaching out to you to request your input on the following questions:

- What information, evidence or complaint statistics can you share that can shed further light on the potential role of bulk registrations in DNS Abuse?
- Are you of the view that further work may be beneficial to address potential issues with bulk registrations in the context of DNS Abuse? If yes, please provide further details.
- What measures, if any, do registrars and/or registries have in place in relation to bulk registrations (examples might include, but are not limited to, additional checks adopted where registrations go above a certain threshold, and restrictions on bulk registrations from new accounts)? Are these found to be effective in constraining malicious actors? Would there be value in promoting the adoption of such measures on a voluntary basis, or should adoption through policy development be considered? Is there potential harm in the adoption of such measures?

With the understanding that bulk registration is a standard feature of the toolset for domain management, we would appreciate it if you could indicate whether your group has further descriptions attached to that term, and whether it carries different meanings to different members.

Based on your feedback, the Council intends to further assess what work, if any, should be considered in relation to bulk registrations. We would appreciate it if you could indicate how much time you need to provide the Council with a response so we can plan our next conversation accordingly.

Thank you for your cooperation.

Sebastien Ducos  
GNSO Chair

