

22 February 2023

RE: Bulk Registrations

Sebastien Ducos
Chair, Generic Names Supporting Organization (GNSO)

Dear Sebastien:

Thank you for your 6 January 2023 letter with questions on the topic of bulk registrations. Below we attempt to respond to the question directed at Internet Corporation for Assigned Names and Numbers (ICANN) Contractual Compliance, namely:

“What information, evidence or complaint statistics can you share that can shed further light on the potential role of bulk registrations in DNS Abuse?”

ICANN agreements and policies do not contain requirements or limitations related to registering domain names in bulk. As a result, ICANN Contractual Compliance does not collect or track information on bulk registrations, the potential role these may play in Domain Name System (DNS) abuse, or any measures not required by ICANN agreements that registrars or registry operators may have in place in relation to bulk registrations.

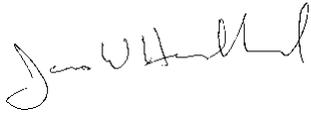
Complaints involving large numbers of domain names are addressed through the same process as others involving single domain names. The applicable obligations are enforced with respect to all relevant domain names within each complaint. Examples of these complaint submissions include:

- Registrants encountering issues with the renewal or transfer requests of entire portfolios;
- Parties reporting registration data inaccuracies for numerous domain names; and
 - These reports may include domain names with the same registration data and registered on the same or different dates.
 - ICANN Contractual Compliance enforces all accuracy requirements, including data verification and format validation. However, these complaints do not generally detail whether the inaccuracies were detected as part of an investigation into DNS abuse.
- Parties reporting a list of domain names allegedly used to perpetrate abuse (e.g., one single complaint involving numerous pharma-related domain names registered with and reported to the same registrar).
 - As with the previous example, some of the domain names may share registration data and/or the creation date. However, these statistics are neither at our

disposal, nor is the information always publicly available, nor is it always provided to ICANN Contractual Compliance within the course of an investigation.

We hope this information is helpful. We would be happy to answer any additional questions you may have.

Sincerely,



Jamie Hedlund
Senior Vice President, Contractual Compliance & U.S. Government Engagement