

NCSG approves the DNS Abuse Small Team Report. However, we wish to formally record our concern regarding the inclusion of *associated domain checks* as a potential DNS abuse mitigation measure.

While we support effective and proportionate approaches to combating DNS abuse, we have consistently emphasized the need for due process during registration, detection and enforcement stages. Associated domain checks risk enabling overly broad or arbitrary enforcement—particularly if implemented without robust safeguards to ensure registrants are informed, have a meaningful opportunity to respond, and are protected from collateral harm.

Such measures could lead to disproportionate take-down and suspensions and the targeting of legitimate registrants through bulk association-based criteria, undermining fairness, transparency, and accountability. We are also disappointed that due process and access to remedy have not been prioritized by other stakeholders in this work. Domain name registrants are not inherently criminals, and DNS abuse mitigation measures should reflect that presumption.

We therefore cannot support the inclusion of associated domain checks unless and until clear, transparent, and consistently applied due process mechanisms are in place.