

**Statement for the Record on DNS Abuse Mitigation PDPs Motion submitted by Farzaneh Badii and Bruna Dos Santos.**

**This is an NCSG Statement. Bruna Dos Santos abstained on the DNS abuse motion and we are submitting this to record NCSG's concerns and as an explanation for Bruna's abstention.**

First, NCSG maintains its serious concerns regarding Associated Domain Checks. We have consistently stated that ADC poses significant human rights and profiling risks that must be addressed through robust safeguards.

Second, the Final Issue Report did not thoroughly address or adequately respond to our public comments requesting transparency, due diligence requirements, and remedy mechanisms for affected registrants. These concerns were dismissed as not representing a "gap" due to "lack of data," rather than being incorporated as essential Charter requirements.

Third, we are concerned that the Issue Report relies heavily on external reports that, while useful, are not holistic and do not consider or interview all affected stakeholders—particularly domain name registrants who may be harmed by these mitigation measures.

Going forward, NCSG calls for future DNS abuse policy work to be informed by independent research designed in consultation with the ICANN community. This will ensure studies consider all stakeholder perspectives and provide a more holistic, balanced basis for policy development.

Going forward, we recommend that PDPs be informed by independent studies commissioned by ICANN or the GNSO, with research design and methodology developed in consultation with the community. While external reports have merit and provide valuable data, policy development should not rely solely on studies whose design and methodology did not consider the concerns and perspectives of all affected stakeholder groups.

We will engage constructively in the Charter drafting process and expect our substantive concerns to be adequately addressed in the Charter. Our support for the final Charter will depend on whether it includes appropriate safeguards for registrant rights.