

To: Internet Corporation for Assigned Names and Numbers (ICANN)
From: Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG)
Date: September 5, 2012
Subject: Comments on Preliminary Issue Report on Uniformity of Contracts to Address Registration Abuse

To whom it may concern:

The Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG) is a global nonprofit organization founded to develop effective models and solutions to combat online abuse such as phishing, botnets, fraud, spam, viruses and denial-of-service attacks that can cause great harm to both individual and national economies. M³AAWG includes technical experts, researchers and policy specialists from a broad base of Internet service providers and network operators representing over one billion email accounts, and from key technology providers, academia, and volume messaging sender organizations. The multidisciplinary approach at M³AAWG includes the development of industry best practices, educational tools, technical statements on public policy and legislation, and the facilitation of global collaboration.

Upon review of the ICANN “Preliminary Issue Report on Uniformity of Contracts to Address Registration Abuse” we are pleased to see that the issue of shortfalls in contractual agreements that seem to be roadblocks to effective measures in cases of abuse is being examined.

We wholeheartedly agree with and encourage the wholesale adoption of the staff recommendations noted in Section 6 to “initiate a formal Policy Development Process and charter a Working Group to pursue further research.” We also support the effort to seriously “consider a set of initial benchmarks for developing an initial baseline or framework of provisions to battle registration abuse, and define potential reporting requirements to track progress toward those goals.”

We acknowledge that the final Registration Abuse Policies Working Group (RAPWG) report failed to achieve consensus on the issue of “registration” abuse versus “use” abuse. However it is important to underscore that malicious domains, capitalizing on the shortfalls in compliance actions by ICANN and the registrars, and registries – the entire domain ecosystem as it were – are a critical component to illegal activity on the Internet. This is the case whether they are resource or contractually based. We encourage you to continue with this important work toward a resolution that will satisfy the needs of Internet users worldwide, to facilitate a safe environment in which to enjoy their online experiences.

Sincerely,

/signed/

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