					1		
Source Rec	Title	Comment	Preparer Comments	Actions	General Actions	Response	00.7 11 11 0 01
							Clarify, update, combine Recs. 2) As a general point, the report should make clear that
							the independent review team does not accept a
							stalemate where (a) many agree that contractual
		The BC concurs with this recommendation and encourages both staff and the Board to take					provisions are not sufficiently strong but (b) no one is empowered to do anything about it. 3)
		active roles in their implementation. ICANN's compliance function needs improvement, both in					Suggest we group CPH contract-related
					Broad community		recommendations together and note multiple
		on the part of contracted parties or their customers. This recommendation, correctly implemented, would have a lasting impact on ICANN Org's capability to address abuse and			support for Rec. 10, including GAC, BC, IPC		review teams + advisory cmts input is
		ensure security and resilience. The BC further agrees with the specific recommendation about bringing the EPDP to a close and implementing WHOIS policy. All parties need and deserve			WIPO FIRST NCSG		community input to direct ICANN Org contract negotiations. 4) Clarify who should establish the
DC.	Improve the Framework to Define and	bringing the EPDP to a close and implementing WHOIS policy. All parties need and deserve	Character and the Control of the Con	No astire resulted	RrSG oppose; SSAC asks for clarification		performance metrics, and that it's an operational
ВС	10 Measure Registrar & Registry Compliance	the predictability that will come with a fully implemented policy. (3.3.2) Unless the underlying contractual commitments exist to compel contracted parties to act	Strong support	No action required	asks for clarification	Agree	issue not policy.
		within clearly defined parameters and responsibilities, then the compliance measures proposed					
		here seem ineffectual. Does the SSR2 RT believe that these contracts are sufficiently					
		prescriptive with respect to behaviours and the residual issue is simply one of enforcement of		Clarify text, noting where conracts can	1		
		compliance? As the report notes, "Compliance has few options to enforce the agreements" and the measurements proposed in this recommendation appear to 5 measure ineffectuality of		be enforced w/ clear and intentional Compliance action, and where			
	Improve the Framework to Define and	enforcement. Are there measures that could have a beneficial outcome on improving this		contracts need to be improved via	See column I and add		
SSAC	10 Measure Registrar & Registry Compliance	space?	Seeks clarification	negotiations w/ contracted parties	more information	Agree; clarified text	
		#Recommendation 10: The SSR2 team justifies, elaborates more, analyzes impact and		Clarify what requires Board, staff and			
	Improve the Framework to Define and	compares what they are recommending here to the current modes of operations. We also note that the recommendation strays into suggesting board action on areas which the review team is		contracted party action and what	See column I and add		
NCSG	10 Measure Registrar & Registry Compliance	not empowered to comment on such as current GNSO policymaking.	Clarification needed	requires PDP	more information	Disagree, see explanation	
		In general, this recommendation is for policy and should go through the ICANN policy process. Regarding the sub recommendations:					
		regarding the sub-recommendations.					
RrSG	Improve the Framework to Define and 10 Measure Registrar & Registry Compliance		Clarification needed	Clarify what requires Board, staff and	c See column I and add m	o Disagree, see explanation	
		The RvSG notes that Compliance's size and scope has grown exponentially in recent years		a, smarrequires bours, stall allu	000000000000000000000000000000000	= ====================================	
		and we disagree with SSR2's characterization and implication that contractual compliance is so under-enforced or under-resourced that entire new teams need to be hired to deal with specific					
RvSG	Improve the Framework to Define and 10 Measure Registrar & Registry Compliance	under-enforced or under-resourced that entire new teams need to be hired to deal with specific issues. We note this throughout the report, but call it out specifically here.	Disagree			Disagree see explanation	
nyou	10 inleasure registrar & registry Compliance	issues. We note this throughout the report, but call it out specifically here. The IPC is generally supportive of this recommendation, and discusses its support for this	Dioagree			biodyree, see explanation	
		recommendation in greater detail below.					
		The RT recommends, and the IPC supports, several methods for ICANN to better utilize its					
		relationships					
		with the Registrars and Registries to combat DNS abuse, including SSR2 Recommendation 10: "Improve					
		the Framework to Define and Measure Registrar & Registry Compliance," SSR2					
		Recommendation 15: "Enhance Contracts with Registrars and Registries to Incent the Mitigation of DNS Abuse." and					
		SSR2					
		Recommendation 16: "Create Pricing Incentives for Contracted Parties to Mitigate Abuse and					
		Security Threats." The IPC supports these recommendations and any steps to more effectively combat					
		DNS abuse					
		relating to the Registry Agreement (RA) and Registrar Accreditation Agreement (RAA) contracts.					
		Accordingly, the IPC supports these SSR2 recommendations that would					
		require meaningful enforcement of existing obligations of registries and registrars to prohibit					
		security threats and abusive activities, enhance such requirements to further mitigate such					
		activities,					
		include real consequences for registrants who engage in prohibited abusive behavior, and			See column I and add		
IPC	10	motivate active and consistent investigation and response to reports of abuse by registrars.	Agree	Clarify per details	more information	Agree, clarified text	
		the Board asks the SSR2 RT to clarify what functionality beyond complaint handling quitte					
		breach notices, suspensions, and terminations it seeks ICANN Compliance to implement within the scope of the agreements. The Board asks that the SSR2 RT provide greater details on					
		what issues or risks exist from the current operational model, how the SSR2 RT					
		what issues or risks exist from the current operational model, how the SSR2 RT recommendation will address them, and what relevant metrics could be applied to assess					
		implementation. Further, it is unclear what is meant by the terms "performance metrics framework", "guide level				More details have been added; the Board (and staff) should	
	Establish a performance metrics	of compliance", and "other elements that affect abuse, security, and resilience". The Board				review decades of discussions	
	framework to guide the level of compliance by Registrars and Registries	suggests that the SSR2 RT provide more detail on the intent of this recommendation to ensure that it is properly considered for implementation. The Board notes that this recommendation				and written comments by non-	
	for WHOIS obligations (including	may overlap with recommendations from the Initial Report on New of LD Subsequent				contracted parties impacted by abuse and contracted party	
	inaccuracy), as well as other elements that	may overlap with recommendations from the Initial Report on New gTLD Subsequent Procedures (Section 2.12.3), the Registration Directory Service (RDS)-WHOIS2 Review Final Report and recommendations (4.1, 4.2, and 5.1), and CCT Review Team Final Report				action to gain a deeper	
	affect abuse, security, and resilience, as outlined in the RDS/WHOIS2 Review and	Report and recommendations (4.1, 4.2, and 5.1), and CCT Review Team Final Report				uderstanding of Compliance	
ICANN Board	10.1 the CCT Review	recommendations (21). The Board requests clarification on the intent of recommendation 10.1 in light of this potential overlap.	Clarification needed	Clarify per details	See column I and add n	problems, user needs, and or required improvements	
	Establish a performance metrics	·				·	
	framework to guide the level of						
	compliance by Registrars and Registries for WHOIS obligations (including						
	inaccuracy), as well as other elements that	t					
	affect abuse, security, and resilience, as	10.1 - This is already covered by ICANN- Compliance metrics on complaints, Compliance			See column I and add		
RrSG	10.1 the CCT Review.	audit, Whois ARS, monitoring by GDD tech team, etc	Clarification needed	Clarify per details	more information	Disagree, see explanation	
	Establish a performance metrics			1			
	framework to guide the level of						
	compliance by Registrars and Registries for WHOIS obligations (including						
	inaccuracy), as well as other elements that	Compliance-related recommendations must be linked to specific contract terms. "Other elements that affect abuse, security, and resilience" is too vague to be implementable. The					
	affect abuse, security, and resilience, as	elements that affect abuse, security, and resilience" is too vague to be implementable. The					
RySG	outlined in the RDS/WHOIS2 Review and 10.1 the CCT Review.	RySG believes this is out of scope of SSR2.	Clarification needed; in scope	Clarify per details	See column I and add more information	Disagree	
.,	Allocate a specific budget line item for a	and the second of the second o	and the second second	and you down			
	team of compliance officers tasked with						
	actively undertaking or commissioning the work of performance management	10.2 - This is something Compliance already does. A review team, with limited understanding of the operation and structure, should defer to Compliance to determine how it will best allocate			See column Land add		
RrSG	10.2 tests/assessments of agreed SLA metrics.	resources.	Disagree	Clarify per details	more information	Disagree	
· · ·	Allocate a specific budget line item for a	The RvSG does not see the value in specific compliance officers to handle specific contractual	-				
	team of compliance officers tasked with	compliance issues. All of Compliance is capable of responding to compliance compliants and					
	actively undertaking or commissioning the work of performance management	demonstrated that it's canable of conducting a full audit of all Ry contracts on a specific issue					
RySG	 tests/assessments of agreed SLA metrics. 	like SLAs.	Disagree	None		Disagree	
		(3.3.3) Given that the report has noted some challenges relating to enforcement of agreements					
		with contracted parties, it is unclear what the review and the subsequent "recommend the inclusion of requirements" precisely entails.					
	Amend the SLA renewal clause from 'automatically renewed' to a cyclical four-	not then who would be performing such a review? If so, would these compliance officers possess the skills to be able to, "recommend the inclusion of requirements to strengthen the					
	'automatically renewed' to a cyclical four-	possess the skills to be able to, "recommend the inclusion of requirements to strengthen the					
	year renewal that includes a review clause included (this review period would	security and resilience where non-compliance was evident"? Who is to receive the review's recommendations? What criteria would be used by this party to assess these					
	consider the level of compliance to the	recommendations or additional requirements? If requirements are being proposed, where is the contractual foundation to enforce these					
	performance metrics by the Registrar and	If requirements are being proposed, where is the contractual foundation to enforce these					
	Registry and recommend the inclusion of requirements to strengthen the security	requirements? Does recommendation 10.3 implicitly refer to recommendation 15, where changes to the contractual conditions are proposed? Some further clarity on these					
	and resilience where non-compliance was	recommendations would be helpful to understand both the detail of the proposed actions and					
SSAC	10.3 evident).	the overall intent of these recommended measures.	Clarification needed	Clarify per details	See column I	Text clarified	

Source Rec	Title		Comment	Preparer Comments	Actions	General Actions	Response			
	Amend the SLA ren									
	'automatically renew year renewal that in	ed to a cyclical four- ludes a review clause								
	included (this review	period would								
	consider the level of performance metrics	compliance to the								
	Registry and recom									
RrSG	and resilience where 10.3 evident).	non-compliance was	10.3 - It is the position of the RrSG that contract negotiations do not originate from review teams or working groups. That is reserved for ICANN Org, and the RrSG/RySG.	Disagree	None	Nees	Disagree			
RISG	Amend the SLA ren		teams of working groups. That is reserved for ICANN Org, and the RISGIRYSG.	Disagree	None	Notic	Disagree			
	'automatically renew	ed' to a cyclical four-								
	year renewal that in	ludes a réview clause	The RySG believes that this is outside the scope of the SSR2's work. The RySG notes that there is an established contract amendment process: consensus policy and negotiations							
	consider the level of	period would	there is an established contract amendment process: consensus policy and negotiations between CPs and ICANN. This recommendation has no basis in policy or fact - it is a							
	performance metrics	by the Registrar and	conclusory statement that presupposes the question. If the SSR2 has identified problems with							
	Registry and recomm	nend the inclusion of	performance metrics, then it could recommend that ICANN and the community study them. In							
	requirements to stre	ngthen the security	this case, the SSR2 is proceeding down the same slippery slope as CCT-RT in recommending solutions without recommending ICANN first engage in exploration and work to determine if a							
RySG	10.3 evident).	non-compliance was	solution is needed.	Disagree	None	None	Disagree			
	Further, the ICANN	Board should take								
	responsibility for brir	aina the EPDP to	10.4 - It is not for a review team to determine the pace of the PDPs or IRTs. There can be							
	closure and passing WHOIS policy in the	year after this report	unexected issues that arise (as during the implementation of EPDP Phase 1), and it is better for ICANN to develop and implement policy properly rather than rushing to meet an artificial							
RrSG	10.4 is published.	,	deadline.	Misinterpreted SSR2 Rec	Clarify	Clarify	Misunderstood Rec.; clarified			
	Further, the ICANN		The RySG notes that this recommendation is not made to the appropriate party. A							
	responsibility for brin	ging the EPDP to	recommendation on a GNSO policy process should be referred to the GNSO Council as the							
	WHOIS policy in the	and implementing a year after this report	manager of the policy process. Furthermore, it's outside the scope of a review team to recommend that a PDP wrap up (as it undoubtedly will even without the RT's							
RySG	10.4 is published.		recommendation).	Misinterpreted SSR2 Rec	Clarify	Clarify	Misunderstood Rec.; clarified			
	Further, the ICANN	Board should take								
	responsibility for brir closure and passing									
	WHOIS policy in the	year after this report	The GAC also agrees with Recommendation 10.4 on implementing the EPDP policy							
GAC	10.4 is published.		recommendations within 1 year.	Agreed	None	None	Agree			
			While the IPC is supportive of the intent behind recommendation 10.4, it notes that it is not the							
			role of the Board to direct the outcome or timing of a community-led PDP. The RT may wish to							
IPC	10.4		revise this language, for example to refer to the Board itself, and via Org, offering all necessary support to achieve the desired outcome	Misinterpreted SSR2 Rec	Clarify	Clarify	Misunderstood Rec; clarified			
			The BC concurs with this recommendation and reiterates its previous statements regarding			·				
			DNS abuse: *while the BC appreciates the need for actionable definitions of abuse, we are concerned							
			about recent efforts to limit or otherwise over-restrict discussion about the serious issue of							
			domain name system abuse. Such asubject deserves fulsome consideration by the entire							
			community •ICANN has a responsibility to enforce its contracts in the areas of DNS-related abuse. This							
			 CANN has a responsibility to enforce its contracts in the areas of DNS-related abuse. This community dialogue cannot delay or defer ICANN's commitments or operations related to DNS 							
			abuse.							
			 ICANN should clarify the purposes and applications of "abuse" before further work is done to define DNS abuse. 			Stalemate situtation is				
			+Once those purposes are identified. ICANN should determine whether shope definitions used			highly problematic. No				
	Lead Efforts to Evolv	e Definitions Around	by outside sources can serve as references for the ICANN community, or whether a new, outcomes-based nomenclature could be useful (including impersonation, fraud, or other types		confirm "consideration by the entire	one responsible - no				
	Abuse and Enable F	eporting Against	outcomes-based nomenclature could be useful (including impersonation, fraud, or other types		community" is this reflected, do we	change. Address this				
	11 Those Definitions		of abuse) to accurately describe problems being addressed.	Agreed	want that?	concern in text.	Agree			
	11 Those Definitions Lead Efforts to Evolv			Agreed	want that?	concern in text. Review whether more	Agree that ICANN Org			
	Lead Efforts to Evolution	e Definitions Around	#Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is	Agreed Details should be provided in the subsequent		Review whether more detailed implementation	Agree that ICANN Org implementation plans should provide details on methodology			
NCSG	Lead Efforts to Evolv	e Definitions Around		Agreed Details should be provided in the subsequent implementation plans	want that? Check ISO and NIST	Review whether more	Agree that ICANN Org implementation plans should provide details on methodology and validation			
NCSG	Lead Efforts to Evolution	e Definitions Around	#Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms.	Agreed Details should be provided in the subsequent implementation plans		Review whether more detailed implementation	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.: as w/ all			
NCSG	Lead Efforts to Evolution	e Definitions Around	#Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RRSG has concerns about this recommendation. The ICANN community is currently	Agreed Details should be provided in the subsequent implementation plans		Review whether more detailed implementation	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved: however, this effort			
NCSG	Lead Efforts to Evol Abuse and Enable F 11 Those Definitions	e Definitions Around eporting Against	#Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RRSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threat can be difficult to define broady, which is perhaps indictive why	Agreed Details should be provided in the subsequent implementation plans		Review whether more detailed implementation	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved; however, this effort should not be driven by CPH's			
NCSG	Lead Efforts to Evol Abuse and Enable R 11 Those Definitions	e Definitions Around eporting Against	#Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The propagation of the contraction of the con	implementation plans		Review whether more detailed implementation	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved; however, this effort should not be driven by CPH's (or ICANN Ord's) desire to			
NCSG RrSG	Lead Efforts to Evol Abuse and Enable F 11 Those Definitions	e Definitions Around eporting Against	effectormentation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why which have understanding of implications of these activities, be involved in the process (rather	Agreed Details should be provided in the subsequent implementation plans Never said RrSG shouldn't be involved as part of community		Review whether more detailed implementation	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved; however, this effort should not be driven by CPH's			
	Lead Efforts to Evoh Abuse and Enable F 11 Those Definitions Lead Efforts to Evoh Abuse and Enable F	e Definitions Around eporting Against	SRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and restal activities, as are the contracted parties. The definition of abuse and restal activities he eview team it is essential that contracted parties. The term is not a definition that statisties he eview team it is essential that contracted parties, than the ICANN board engaging only security-related community members). The RAC welcomes Recommendation of 1 on efforts to implement current community veted	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST	Review whether more detailed implementation guidance is appropriate	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved; however, this effort should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities,			
	Lead Efforts to Evoh Abuse and Enable F 11 Those Definitions Lead Efforts to Evoh Abuse and Enable F	e Definitions Around eporting Against	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threat activities, as are the contracted parties. The definition of the sand threates can be difficult to define broadly, which is perhaps indicitive why there is not a definition that satisfies the eview team. It is essential that contracted parties, than the ICANN board engaging only security-related community members. The GAC welcomes Recommendation 11 on efforts be implement current community wited definitions of IDAS Abuse without delaw and the need to require that feriorings earliers services in the security of the contraction of the con	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST	Review whether more detailed implementation guidance is appropriate	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved; however, this effort should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities,			
	Lead Efforts to Evoh Abuse and Enable F 11 Those Definitions Lead Efforts to Evoh Abuse and Enable F	e Definitions Around eporting Against	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indicative why there is not a definition that satisfies he review team. It is essential that contracted parties, which have undestanding of implications of these activities, be involved in the process (ordher than the ICANN board engaging only secully-related community) methods. The CAC velcomes Recommendation 11 on efforts to implement current community velted definitions of DNA bases without delay and the need to ensure that definitions exolve to meet	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST	Review whether more detailed implementation guidance is appropriate	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved; however, this effort should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities,			
	Lead Efforts to Evoh Abuse and Enable F 11 Those Definitions Lead Efforts to Evoh Abuse and Enable F	ve Definitions Around eporting Against e Definitions Around eporting Against	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RGG has concerns about this recommendation. The LGANN community is currently engaged in abuse and threat activities, as an the contractor parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that satisfies he review team. It is essential that contracted parties, which have undertanding of implications of these activities, be involved in the process (rather than the LCAN) board engaging only securily-related community members. The GAC welcomes Recommendation 11 on efforts be implement current community by the definitions of DNA base without delay and the need to ensure that definitions so volve to meet continuing threats, in the context of efforts aimed at finding a more effective approach to address DNA Shaue, without delay and the read to concern that definitions of DNA shaue without delay and the read to comments, and occurrents, and address DNA Shaue, including with the GAC's support through its advice, comments, and	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement	Review whether more detailed implementation guidance is appropriate	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved; however, this effort should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities,			
	Lead Efforts to Evol Abuse and Enable f 11 Those Definitions Lead Efforts to Evol Abuse and Enable f 11 Those Definitions	ve Definitions Around eporting Against e Definitions Around eporting Against	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RGG has concerns about this recommendation. The LGANN community is currently engaged in abuse and threat activities, as an the contractor parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that satisfies he review team. It is essential that contracted parties, which have undertanding of implications of these activities, be involved in the process (rather than the LCAN) board engaging only securily-related community members. The GAC welcomes Recommendation 11 on efforts be implement current community by the definitions of DNA base without delay and the need to ensure that definitions so volve to meet continuing threats, in the context of efforts aimed at finding a more effective approach to address DNA Shaue, without delay and the read to concern that definitions of DNA shaue without delay and the read to comments, and occurrents, and address DNA Shaue, including with the GAC's support through its advice, comments, and	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1. 11.3. 11.4 —	Review whether more detailed implementation guidance is appropriate	Agree that ICANN Org implementation plans should provide details on methodology and validation Misunderstood Rec.; as w/ all groups, RrSG should be involved; however, this effort should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities,			
RrSG	Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions 11 Those Definitions Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The process including the process in the process in the contracted parties, and there is not a definition that satisfies he review team. It is essential that contracted parties, which have undertanding of implications of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The GAC welcomes Recommendation 11 on efforts to implement current community settlements of the process of the contractivity of the comments and the contractivity of the cont	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1.11.3.11.4 — how does this make sense. Tipiten	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, R765 should be groups, R765 should be groups, R765 should be considered to the details of the d			
	Lead Efforts to Evol Abuse and Enable f 11 Those Definitions Lead Efforts to Evol Abuse and Enable f 11 Those Definitions	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against	effectormendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mischanisms. The RiSS has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indicities why which have understanding of implications of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The GAC vedecones Recommendation of the end to implement current community vetted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet contenting the endage of the contention of the endage of the CAC and the contention of the endage of the CAC and the contention of the endage of the CAC and the contention of the endage of the CAC and the content of the CAC and	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1. 11.3. 11.4 —	Review whether more detailed implementation guidance is appropriate	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, R765 should be groups, R765 should be groups, R765 should be considered to the details of the d			
RrSG	Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions 11 Those Definitions Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against	effectormendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mischanisms. The RiSS has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indicities why which have understanding of implications of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The GAC vedecones Recommendation of the end to implement current community vetted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet contenting the endage of the contention of the endage of the CAC and the contention of the endage of the CAC and the contention of the endage of the CAC and the contention of the endage of the CAC and the content of the CAC and	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make series. [Tiples up wording and be spellet, Add etc.]	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, R765 should be groups, R765 should be groups, R765 should be considered to the details of the d			
RrSG	Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions 11 Those Definitions Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions	te Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against	PRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not all definition that statistics he review team. It is essential that contracted parties, than the ICANN board engaging only security-related community members). The AGA velocomes Recommendation of 10 net forts by implement current community velted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet continuing threats, in the context of efforts simed at finding a more effective approach to address DNS Abuse, including with the GAC's support through its advice, comments, and with regard to the definition of DNS Abuse and Security Printest, it is not quice dear tow the different processes suggested in Recommendations 11.1.1.3 and 11.4 should interestlet. The GAC therefore intense the Review Team to consider, in view of existing procedures and rules, how this goal can be best achieved.	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make series. [Tiples up wording and be spellet, Add etc.]	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, R765 should be groups, R765 should be groups, R765 should be considered to the details of the d			
RrSG	Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions 11 Those Definitions Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions	te Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against	Recommendation 11. As this related to the definition of DNS Albuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The (CANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not all definition that satisfies he review team. It is essential that contracted parties, the result of the contracted parties, the contractive of the result of the contracted parties. The RGA well common the contractive parties, than the ICANN board engaging only security-related community members.) The RGA velocones Recommendation 11 on efforts by implement current community velted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet continuing threats, in the context of efforts simed at finding a more effective approach to address DNS Abuse, including with the GAC's support through its advice, comments, and correspondence. Allough the GAC shares he overall goal of achering clarity and considering different processes suggested in Recommendations 11.1, 11.3 and 11.4 should interestile. The GAC therefore interest the revent goal of achering clarity and considering which the commendation is present extractive and the commendation of the commendation in greater detail below. The RCO is supported to the recommendation, and discusses its support for this recommendation in greater detail below.	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make series. [Tiples up wording and be spellet, Add etc.]	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, R765 should be groups, R765 should be groups, R765 should be considered to the details of the d			
RrSG	Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions 11 Those Definitions Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions	te Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against	Recommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why which have undernating of implications of these activities, be involved in the process (righter than the ICANN board engaging only security-related community members). The GAC velocense Recommendation of these activities, be involved in the process (righter than the ICANN board engaging only security-related community members). The GAC velocense Recommendation of these activities, as in the context of efforts simed at fricting in once efficient expansed to meet continuing threats, in the context of efforts simed at fricting in once efficient expansed in the context of efforts simed at fricting in once efficient expansed in the context of exposure the context of the efficient processes suggested in Recommendations 11.1,113 and 114 about distribution. The ICR is supported to consider, in view of ostillary procedures and rules. The ICR is supportive of this recommendation, and discusses its support for this recommendation in T-Lead Efforts to Evolve Definition Around Abuse and Enable Reporting Recommendation 11.1. Lead Efforts to Evolve Definition of Around Abuse and Enable Reporting	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make series. [Tiples up wording and be spellet, Add etc.]	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, R765 should be groups, R765 should be groups, R765 should be considered to the details of the d			
RrSG	Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions 11 Those Definitions Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions	te Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indicitive why there is not a definition that satisfies he review team. It is essential that contracted parties, which have undertanding of implications of these activities, be involved in the process (after than the ICANN board engaging only security-related community) methods and the contraction of the process of the contraction of t	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make series. [Tiples up wording and be spellet, Add etc.]	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, R765 should be groups, R765 should be groups, R765 should be considered to the details of the d			
RrSG	Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions 11 Those Definitions Lead Efforts to Evol Abuse and Enable 6 11 Those Definitions	te Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against	Recommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why which have undernating of implications of these activities, be involved in the process (righter than the ICANN board engaging only security-related community members). The GAC velocense Recommendation of these activities, be involved in the process (righter than the ICANN board engaging only security-related community members). The GAC velocense Recommendation of these activities, as in the context of efforts simed at fricting in once efficient expansed to meet continuing threats, in the context of efforts simed at fricting in once efficient expansed in the context of efforts simed at fricting in once efficient expansed in the context of exposure the context of the efficient processes suggested in Recommendations 11.1,113 and 114 about distribution. The ICR is supported to consider, in view of ostillary procedures and rules. The ICR is supportive of this recommendation, and discusses its support for this recommendation in T-Lead Efforts to Evolve Definition Around Abuse and Enable Reporting Recommendation 11.1. Lead Efforts to Evolve Definition of Around Abuse and Enable Reporting	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make series. [Tiples up wording and be spellet, Add etc.]	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, R765 should be groups, R765 should be groups, R765 should be considered to the details of the d			
RrSG	Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions	e Definitions Around eporting Against	PRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps inclicitive the view is not all definition that statistics he review team. It is essential that contracted parties, than the ICANN board engaging only security-related community members). The AGA velocomes Recommendation of 10 net forts by implement current community velted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet continuing threats, in the context of efforts aimed at finding a more effective approach to address DNS Abuse, including with the GAC's support through its advice, comments, and with regard to the definition of DNS Abuse and Security Preats, it is not quite clear to we the different processes suggested in Recommendations 11.1,11.3 and 11.4 should interelate. The GAC therefore intense the Review Team to consider, in view of existing procedures and rules, how this goal can be best achieved. The IPC is supported of this recommendation, and discusses its support for this As a preliminary matter, the IPC supports SSR2. Recommendation 11.1 Lead Efforts to Evolve Definitions Around Abuse and Enable Reporting Against.	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tipithen up wording and be spillet. Add each on what process could look like.	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Maunderstock Rec.; as w ² all with a should be involved; however, this effort should not be driven by CPH's (or ICANN Org) desire to accountability or cost. Agree; clarification and more detail provided			
RrSG	Lead Efforts to Evolt Abuse and Enable file 11 Those Definitions Lead Efforts to Evolt Abuse and Enable file 11 Those Definitions Lead Efforts to Evolt Abuse and Enable file 11 Those Definitions	e Definitions Around eporting Against drive efforts that drive efforts that	PRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps inclicitive the view is not all definition that statistics he review team. It is essential that contracted parties, than the ICANN board engaging only security-related community members). The AGA velocomes Recommendation of 10 net forts by implement current community velted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet continuing threats, in the context of efforts aimed at finding a more effective approach to address DNS Abuse, including with the GAC's support through its advice, comments, and with regard to the definition of DNS Abuse and Security Preats, it is not quite clear to we the different processes suggested in Recommendations 11.1,11.3 and 11.4 should interelate. The GAC therefore intense the Review Team to consider, in view of existing procedures and rules, how this goal can be best achieved. The IPC is supported of this recommendation, and discusses its support for this As a preliminary matter, the IPC supports SSR2. Recommendation 11.1 Lead Efforts to Evolve Definitions Around Abuse and Enable Reporting Against.	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tipithen up wording and be spillet. Add each on what process could look like.	Review whether more detailed implementation guidance is appropriate Clarify	Agree that ICANN Org implementation plans should provide details on methodology and validation. Maunderstock Rec.; as w ² all with a should be involved; however, this effort should not be driven by CPH's (or ICANN Org) desire to accountability or cost. Agree; clarification and more detail provided			
RrSG	Lead Efforts to Evolt Abuse and Enable file 11 Those Definitions Lead Efforts to Evolt Abuse and Enable file 11 Those Definitions Lead Efforts to Evolt Abuse and Enable file 11 Those Definitions	e Definitions Around eporting Against drive efforts that drive efforts that	PRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The (CANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that staffsites he eview team it is essential that contracted parties. The definition of abuse and threat activities he eview team it is essential that contracted parties. The TAR Association of the property of t	implementation plans Never said RrSG shouldn't be involved as part of community	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tipithen up wording and be spillet. Add each on what process could look like.	Review whether more detailed implementation guidance is appropriate Clarify	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstock Rec.; as will all implementation methodology and validation involved; however, this effort should not be driven by CPH's (or ICANN Org) deser to method to be driven by CPH's (or ICANN Org) deser to method to be driven by CPH's (or ICANN Org) deser to accountability or cost. Agree; clarification and more detail provided			
RrSG GAC IPC	Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions	e Definitions Around eporting Against drive efforts that language and reach bible agreement on unity threats in its	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that satisfies he review team. It is essential that contracted parties, which have undertanding of implications of these activities, be involved in the process (after than the ICAN's board engaging only securily-related community) methods and the contraction of the contraction	implementation plans Never said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tighten on what process could took like.	Review whether more detailed implementation guidance is appropriate Clarify	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, RFSG should be groups, RFSG should be groups, RFSG should be for the should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities, accountability or cost. Agree; clarification and more detail provided			
RrSG	Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against drive efforts that language and reach the agreement on any other agreement or any other around eporting Against	PRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The (CANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that staffsites he eview team it is essential that contracted parties. The definition of abuse and threat activities he eview team it is essential that contracted parties. The TAR Association of the property of t	implementation plans Never said RrSG shouldn't be involved as part of	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tipithen up wording and be spillet. Add each on what process could look like.	Review whether more detailed implementation guidance is appropriate Clarify	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstock Rec.; as will all implementation methodology and validation involved; however, this effort should not be driven by CPH's (or ICANN Org) deser to method to be driven by CPH's (or ICANN Org) deser to method to be driven by CPH's (or ICANN Org) deser to accountability or cost. Agree; clarification and more detail provided			
RrSG GAC IPC	Lead Efforts to Evol Abuse and Enable Fill Those Definitions Lead Efforts to Evol Abuse and Enable Fill Those Definitions Lead Efforts to Evol Abuse and Enable Fill Those Definitions Lead Efforts to Evol Abuse and Enable Fill Those Definitions 11 Those Definitions 12 CANN Board should iminimize ambiguous a universally accept abuse. SSR, and se abuse Fill Abuse SSR, and se 11.1 implementation plant (ANN org and Board CANN o	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against drive efforts that language and reach bits agreement on unity threets in its second and the second are second as a second and are second as a second are second as a second are second as a s	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that satisfies he review team. It is essential that contracted parties, which have undertanding of implications of these activities, be involved in the process (after than the ICAN's board engaging only securily-related community) methods and the contraction of the contraction	implementation plans Never said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tighten on what process could took like.	Review whether more detailed implementation guidance is appropriate Clarify	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, RFSG should be groups, RFSG should be groups, RFSG should be for the should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities, accountability or cost. Agree; clarification and more detail provided			
RrSG GAC IPC	Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions	e Definitions Around eporting Against to Definitions Around eporting Against to Definitions Around eporting Against drive efforts that language and reach blue agreement our ourly threats in its design and the desi	Recommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and frested activities, as are the contracted parties. The definition of abuse and restal activities, as are the contracted parties. The definition of abuse and restal activities, as are the contracted parties. The definition of abuse and restal activities to self-related community members). The RAC welcomes Recommendation of 1 on efforts to implement current community veted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet containing threats, in the context of efforts aimed at finding a more effective approach to containing threats, in the context of efforts aimed at finding a more effective approach to order the processes suggested in Recommendations 11.1, 11.3 and 11.4 should interestale. The ACC hieracts the overall goal of activities and activities of the definition of DNS Abuse and Security Prinatals, it is not quite death only the different processes suggested in Recommendations 11.1, 11.3 and 11.4 should interestale. The ACC theates the relates the Review Team to consider, in view of existing procedures and rules. The IPC is supportive of the recommendation in greater detail below. As a preliminary matter, the IPC supports SSR2. Recommendation in greater detail below. The SPG does not think it is feasible or realistic for there to be "universally acceptable agreement" on definitions for abuse, SSR, and security threats but is willing to continue its extensive cognition discussions to try to reach such an agreement.	implementation plans Never said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tighten on what process could took like.	Review whether more detailed implementation guidance is appropriate Clarify	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, RFSG should be groups, RFSG should be groups, RFSG should be for the should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities, accountability or cost. Agree; clarification and more detail provided			
RrSG GAC IPC	Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions 11 ICANN Board shoul Imminize ambiguout Imminize ambiguout Internation plan Board shoul Board	e Definitions Around eporting Against a Definitions Around eporting Against be Definitions Around eporting Against a drive efforts that language and reach language and reach language and reach language and so a definition of the language and reach language and	Recommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and frested activities, as are the contracted parties. The definition of abuse and restal activities, as are the contracted parties. The definition of abuse and restal activities, as are the contracted parties. The definition of abuse and restal activities to self-related community members). The RAC welcomes Recommendation of 1 on efforts to implement current community veted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet containing threats, in the context of efforts aimed at finding a more effective approach to containing threats, in the context of efforts aimed at finding a more effective approach to order the processes suggested in Recommendations 11.1, 11.3 and 11.4 should interestale. The ACC hieracts the overall goal of activities and activities of the definition of DNS Abuse and Security Prinatals, it is not quite death only the different processes suggested in Recommendations 11.1, 11.3 and 11.4 should interestale. The ACC theates the relates the Review Team to consider, in view of existing procedures and rules. The IPC is supportive of the recommendation in greater detail below. As a preliminary matter, the IPC supports SSR2. Recommendation in greater detail below. The SPG does not think it is feasible or realistic for there to be "universally acceptable agreement" on definitions for abuse, SSR, and security threats but is willing to continue its extensive cognition discussions to try to reach such an agreement.	implementation plans Never said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4— how does this make series. Typically to working and be explicit. Add text on what process could look like. None Clarify explanation.	Review whether more detailed implementation guidance is appropriate Clarify	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all groups, RFSG should be groups, RFSG should be groups, RFSG should be for the should not be driven by CPH's (or ICANN Org's) desire to minimize their responsibilities, accountability or cost. Agree; clarification and more detail provided			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions 11 CANN Board should minimize ambiguous au nuiversally accept abuse. SSR, and see 11.1 implementation plant in CANN org and See 11.1 implementation plant (CANN org and See the SSR-Relevant co with CCT and RDS) community wited all community wited all community wited and community wited all community wited and community wited all community w	e Definitions Around eporting Against a Definitions Around eporting Against be Definitions Around eporting Against a drive efforts that language and reach language and reach language and reach language and so a definition of the language and reach language and	BRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The (CANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that staffsites he eview team. It is essential that contracted parties. The definition of abuse and threat activities, as are the contracted parties. The results are the contracted parties where is not a definition that staffsites he eview team it is essential that contracted parties. The TAR As the second of the contracted parties where is not a definition of DNS abuse without delay and the need to ensure that definitions evoke to meet continuing threats, in the context of efforts simed at finding a more effective approach to address DNS Abuse, including with the CAC's support through its advice, comments, and with regard to the definition of DNS Abuse and Security Printest, its into quite clear how the different processes suggested in Recommendations 11.1, 11.3 and 11.4 should interrelate. The ACC welcomments and the clear how the different processes suggested in Recommendations 11.1, 11.3 and 11.4 should interrelate. The ACC therefore intense the Review Team to consider, in view of existing procedures and rules, how this goal can be best achieved. The IPC is supported SR2. As a preliminary matter, the IPC supports SR2. Recommendation 11. 'Lead Efforts to Evoke Definitions Around Abuse and Enable Reporting Against Acceptance of the processes of the processe	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tighten up wording and be spillet. Add etc on what process could look like. None Clarify explanation.	Review whether more detailed implementation guidance is appropriate Clarify Clarify, add more detail	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec. 2s of all Misunderstood Rec. 2s of all microvided; however, this effort should not be driven by CPH's (or ICANN Org) desire to minimize their responsibilities, accountability or root. Agree; clarification and more detail provided.			
RrSG GAC IPC	Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions 11 ICANN Board shoul Imminize ambiguout Imminize ambiguout Internation plan Board shoul Board	e Definitions Around eporting Against a Definitions Around eporting Against be Definitions Around eporting Against a drive efforts that language and reach language and reach language and reach language and so a definition of the language and reach language and	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation michanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indicitive why which have understanding of implications of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The GAC velocomes Recommendation of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The GAC velocomes Recommendation of 1 on efforts to implement current community vetted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet address DNS Abuse, including with the GACs support through its advice, comments, and correspondence. Although the GACs shares the overall goal of achieving clarity and consistency with regard to the definition of DNS Abuse and Security Threats, it is not quite delay to consistency with regard to the definition of DNS Abuse and Security Threats, it is not quite delay because and Security Threats, it is not quite delay to the CACs support through its advice, and the control of the commendation in preader deall before abuse and security. The IPC is supportive of this recommendation in preader deall before to define abuse so that reporting and consequences for abuse control of the preader deal before to define abuse so that reporting and consequences for abuse confidence for abuse. SRR and security invested to willing to continue its extensive ongoing discussions to try to reach such an agreement. [3,3,4] if the underlying issue is that SSRD has found evidence that the ICANN Board and its should say as explicitly. This recommendation that refers to recommendations from other reviews feed	implementation plans Never said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4— how does this make series. Typically to working and be explicit. Add text on what process could look like. None Clarify explanation.	Review whether more detailed implementation guidance is appropriate Clarify	Agree hat ICANN Organization plans should provide details on methodology articles and provide details on methodology and provide details on methodology and provide plans and pl			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions 11 CANN Board should minimize ambiguous au nuiversally accept abuse. SSR, and see 11.1 implementation plant in CANN org and See 11.1 implementation plant (CANN org and See the SSR-Relevant co with CCT and RDS) community wited all community wited all community wited and community wited all community wited and community wited all community w	e Definitions Around eporting Against a Definitions Around eporting Against be Definitions Around eporting Against a drive efforts that language and reach language and reach language and reach language and so a definition of the language and reach language and	Recommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive where he not addition that statisties he evere team. It is essential that contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive where he not addition that statisties he evere team. It is essential that contracted parties, that the ICANN board engaging only security-related community members.) The GAC welcomes Recommendation of 1 on efforts to implement current community veted definitions of DNS Abuse without delays and the need to ensure that definitions evoke to meet continuing times, in the context of efforts aimed at finding a more effective approach to contraining the expression of the processes suggested in Recommendation and the processes suggested in Recommendation of 11.1, 11.3 and 11.4 about distribution. The ICR is supportive of this recommendation, and discusses its support for this recommendation in greater detail below. As a preliminary matter, the ICP supports SSR2. The DR is supportive of this recommendation, and discusses its support for this recommendation in greater detail below. As a preliminary matter, the ICP supports SSR2. The SRG does not think it is feasible or realistic for there to be "universally acceptable agreement" on definitions for abuse, SSR, and security threats but is willing to continue its extensive origing discussions to ity reach such an apprehent. (3.3.4) If the underlying issue is that SSR2 has found evidence that the ICANN Board and ICANN org are not properly processing and acting on the outcomes of other reviews then it should as you expeditive.	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tighten up wording and be spillet. Add etc on what process could look like. None Clarify explanation.	Review whether more detailed implementation guidance is appropriate Clarify Clarify, add more detail	Agree with contention has soud implementation plans should provide details on methodology and validation. Misunderstood Rec.: se will all the second plans should be involved; however, this effort should not be driven by CPH's (or ICARN Origin) desire to accountability or cost. Agree: clarification and more detail provided and more detail provided and plans of the second plans of th			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable fill Those Definitions Lead Efforts to Evol Abuse and Enable fill Those Definitions Lead Efforts to Evol Abuse and Enable fill Those Definitions Lead Efforts to Evol Abuse and Enable fill Those Definitions Lead Efforts to Evol Abuse and Enable fill Those Definitions 11 Those Definitions 11 Those Definitions 11 Those Definitions 11 Implementation plant abuse, SSR, and se control to the property of	e Definitions Around eporting Against to drive efforts that language and reach language and reach currly threats in its cet of parties and because the property of th	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly within sperhaps indicitie well which have understanding of implications of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The RGC welcomes Recommendations of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The RGC welcomes Recommendation of 1 on efforts to implement current community vetted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet address DNS Abuse, including with the GACs support through its advice, comments, and correspondence. Although the GACs shares the overall goal of achieving clarity and consistency with regard to the definition of NNS Abuse and Security Phreats, it is not quite clear to when the great cells below and the coveral goal of achieving clarity and consistency with regard to the definition of NNS Abuse and Security Phreats, it is not quite clear to when the great cells below as a Security Phreats, it is not quite clear to when the great cells below as a Security Phreats, it is not quite clear to when the great cells below and the commendation and discusses its support for this recommendation in greater detail belows SNS2. Recommendation 11: "Lead Efforts to Evolve Definitions Around Abuse and Enable Reporting Against Those Definitions" and any related efforts to define abuse so that reporting and consequences can flow more efficiently from an agreed-upon definition. The RyGG does not think it is feasible or realistic for there to be "universally acceptable agreement" on definitions for abuse,	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tipsten up wording and be spilot. Add test on what process could look like. None Clarify explanation. This is clearly an issue: wholsinds, art, sart, etc. not our issue to solve but state facts.	Review whether more detailed implementation guidance is appropriate Clarify Clarify, add more detail	Agree hat ICANN Organization plans should provide details on methodology and validation. Misunderstood Rec.; as will all travover, however, this effort should not be driven by CPH's (or ICANN Organization) and one of the plans of the driven by CPH's (or ICANN Organization) and one of the plans of the driven by CPH's (or ICANN Organization) and organization and more detail provided Agree; clarification and more detail provided Agree Clarified. Disagree with contention that such an abuse definition is not feasible. Agree. Clarified. Agree. Clarified. Agree and understanding. Team has documented how it's ICANN Organization and understanding. Team has documented how it's ICANN ORGANIZATION ORGAN			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable Filt Those Definitions Land Efforts to Evol Abuse and Enable Filt Those Definitions Land Efforts to Evol Abuse and Enable Filt Those Definitions Lead Efforts to Evol Abuse and Enable Filt Those Definitions Lead Efforts to Evol Abuse and Enable Filt Those Definitions Lead Efforts to Evol Abuse and Enable Filt Those Definitions 11 ICANN Board should minimize ambiguous au inversally accept our authority and the Effort Control of the Effor	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against derive efforts that language and reach the agreement on only properly and the agreement of th	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly within sperhaps indicitie well which have understanding of implications of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The RGC welcomes Recommendations of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The RGC welcomes Recommendation of 1 on efforts to implement current community vetted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet address DNS Abuse, including with the GACs support through its advice, comments, and correspondence. Although the GACs shares the overall goal of achieving clarity and consistency with regard to the definition of NNS Abuse and Security Phreats, it is not quite clear to when the great cells below and the coveral goal of achieving clarity and consistency with regard to the definition of NNS Abuse and Security Phreats, it is not quite clear to when the great cells below as a Security Phreats, it is not quite clear to when the great cells below as a Security Phreats, it is not quite clear to when the great cells below and the commendation and discusses its support for this recommendation in greater detail belows SNS2. Recommendation 11: "Lead Efforts to Evolve Definitions Around Abuse and Enable Reporting Against Those Definitions" and any related efforts to define abuse so that reporting and consequences can flow more efficiently from an agreed-upon definition. The RyGG does not think it is feasible or realistic for there to be "universally acceptable agreement" on definitions for abuse,	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tipithen up wording and be spillet. Add text on what process could look like. None Clarify explanation. This is clearly an issue: wholsinds, att, sart, etc. not our issue to solve but state facts. Clarify in explanation. Foolholde	Review whether more detailed implementation guidance is appropriate Clarify Clarify, add more detail	Agree with contention that such an abuse definition is not grazies with contention that provided a contention to the contention of the con			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions 11 Those Definitions 11 CANN Board should minimize ambiguous au inversarially accept abuse. SRR, and see the SRR-elevant co. with CCT and RDSI recommendations plant in the state of the SRR elevant co. with CCT and RDSI recommendations of the SRR-elevant co. with CCT and RDSI recommendations of	e Definitions Around eporting Against to Definitions Around eporting Against to Definitions Around eporting Against to Definitions Around eporting Against drive afforts that language and reach bloke agreement outputly threats in its close of the against of the against of the against of the against outputly threats in its close against of the against outputly threats in its close against outputly threats in its close against outputly threats in its close against outputly threats and of about implement multiments (against wholes Review against output the against	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive thy which have undertaken and the definition of abuse and threats can be difficult to define broadly, which is perhaps indictive thy which have undertaken and the properties of the	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tipsten up wording and be spilot. Add test on what process could look like. None Clarify explanation. This is clearly an issue: wholsinds, art, sart, etc. not our issue to solve but state facts.	Review whether more detailed implementation guidance is appropriate Clarify Clarify, add more detail	Agree hat ICANN Org. Magnetistophenesses of the second of			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Land Efforts to Evol Abuse and Enable fi 21 Those Definitions 11 Those Definitions Lead Efforts to Evol Abuse and Enable fi 21 Those Definitions Lead Eff	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against device efforts that language and reach blob agreement on the against and a should implement multimetris (along asset on current, use definitions, asset on current.	PRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that statisties he review team it is essential that contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that statisties he review team it is essential that contracted parties. The Team of the CANN board engaging only security-related community members.) The RAC welcomes Recommendation of 1 on efforts to implement current community veted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet containing threats, in the context of efforts aimed at finding a more effective approach to ordinating threats, in the context of efforts aimed at finding a more effective approach to ordinating threats, in the context of efforts aimed at finding a more effective approach to ordinating threats. Although the CAC shares the overall goal of a chewing clarity and consistency with regard to the definition of DNS Abuse and Security Threats, it is not quite clear how the different processes suggested in Recommendations 11.1, 11.3 and 11.4 should interestlet. The CAC therefore the efforts aimed at finding threats, it is not quite deal below. As a preliminary matter, the IPC supports SSR2 as Recommendation in greater detail below. The IPC is support to of this recommendation and discusses its support for this recommendation in greater detail below. The RySG does not think it is feasible or realistic for there to be "universally acceptable agreement" on definitions for abuse, SSR2 and security threats but is willing to continue its extensive congon	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tighten up worting and be seption. And test on what process could look title. None Clarify explanation. This is clearly an issue: wholerids, att, ssr1, etc. not our issue is only but state facts. Clarify in explanation. Foolinote "vetted definition". Not in accomity vetted definition". Not in accomity vetted definition. Not in accomity vetted. Number 2 people visar related.	Review whether more detailed implementation guidance is appropriate Clarify Clarify, add more detail	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.: se will all the plans of the pl			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against device efforts that language and reach blob agreement on the against and a should implement multimetris (along asset on current, use definitions, asset on current.	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive thy which have undertaken and the definition of abuse and threats can be difficult to define broadly, which is perhaps indictive thy which have undertaken and the properties of the	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tipsten up wording and be explict. Add text on what process could look like. None Clarify explanation. This is clearly an issue: wholeinds, att, sart, etc. not our issue to solve but date facts. Clarify in explanation. Foolnote "vetted definition". Not in scope steeping the country of the process of the second process of the	Review whether more detailed implementation guidence is appropriate Clarify Clarify, add more detail	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all recovery the second of the s			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable Filt Those Definitions Land Efforts to Cyol Abuse and Enable Filt Those Definitions Land Efforts to Cyol Abuse and Enable Filt Those Definitions Lead Efforts to Evol Abuse and Enable Filt Those Definitions	the Definitions Around eporting Against the Definition of Definiti	PRecommendation 11. As this related to the definition of DNS Alouse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that statisties he review team it is essential that contracted parties. The definition of abuse and threats can be difficult to define broadly, which is perhaps indictive why there is not a definition that statisties he review team it is essential that contracted parties. The Team of the CANN board engaging only security-related community members.) The RAC welcomes Recommendation of 1 on efforts to implement current community veted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet containing threats, in the context of efforts aimed at finding a more effective approach to ordinating threats, in the context of efforts aimed at finding a more effective approach to ordinating threats, in the context of efforts aimed at finding a more effective approach to ordinating threats. Although the CAC shares the overall goal of a chewing clarity and consistency with regard to the definition of DNS Abuse and Security Threats, it is not quite clear how the different processes suggested in Recommendations 11.1, 11.3 and 11.4 should interestlet. The CAC therefore the efforts aimed at finding threats, it is not quite deal below. As a preliminary matter, the IPC supports SSR2 as Recommendation in greater detail below. The IPC is support to of this recommendation and discusses its support for this recommendation in greater detail below. The RySG does not think it is feasible or realistic for there to be "universally acceptable agreement" on definitions for abuse, SSR2 and security threats but is willing to continue its extensive congon	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4 — how does this make sense. Tighten up worting and be seption. And test on what process could look title. None Clarify explanation. This is clearly an issue: wholerids, att, ssr1, etc. not our issue is only but state facts. Clarify in explanation. Foolinote "vetted definition". Not in accomity vetted definition". Not in accomity vetted definition. Not in accomity vetted. Number 2 people visar related.	Review whether more detailed implementation guidance is appropriate Clarify Clarify, add more detail	Agree that ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.: se will all the plans of the pl			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and Enable file 11 Those Definitions Lead Efforts to Evol Abuse and	the Definitions Around eporting Against ve Definition of the Very Against very very very very very very very very	BROCOMMENDATION TO A STATE OF THE PICE AND T	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tipsten up wording and be explict. Add text on what process could look like. None Clarify explanation. This is clearly an issue: wholeinds, att, sart, etc. not our issue to solve but date facts. Clarify in explanation. Foolnote "vetted definition". Not in scope steeping the country of the process of the second process of the	Review whether more detailed implementation guidence is appropriate Clarify Clarify, add more detail	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all recovery the second of the s			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Land Efforts to Evol Abuse and Enable fi 12 Those Definitions 13 Those Definitions Lead Efforts to Evol Abuse and Enable fi 14 Those Definitions Lead Efforts to Evol Abuse and Enable fi 16 Those Definitions Lead Efforts to Evol Abuse and Enable fi 17 Those Definitions Lead Efforts to Evol Abuse and Enable fi 18 Those Definitions Lead Efforts to Evol Abuse SSR, and se contracts with confirmed abuse, SSR, and se contracts with confirmed to the c	e Definitions Around eporting Against e Definitions Around eporting Against e Definitions Around eporting Against device efforts that language and reach blob agreement on the against and the against a definitions, as a definition as a definition and the against a definition and	BROCOMMENDATION TO A STATE OF THE PICE AND T	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tipsten up wording and be explict. Add text on what process could look like. None Clarify explanation. This is clearly an issue: wholeinds, att, sart, etc. not our issue to solve but date facts. Clarify in explanation. Foolnote "vetted definition". Not in scope steeping the country of the process of the second process of the	Review whether more detailed implementation guidence is appropriate Clarify Clarify, add more detail	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all recovery the second of the s			
RrSG GAC IPC RySG	Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions 11 Those Definitions Lead Efforts to Evolt Abuse SSS Reference Lead Efforts to Evolt Abuse SSS Reference Lead Efforts to Evolt Abuse SSS Reference Lorent Community vetted at 12 without delay Lead Efforts to Evolt Lead Efforts to Evolt Abuse SSR Reference to with CCT and RDSI community vetted at 12 without delay Lead Efforts to Evolt Lead Efforts to Evolt Lead Efforts to Evolt Abuse Community Lead Efforts to Evolt Lead Efforts to Evolt Lead Efforts to Evolt Abuse and Enable fi 11 Those Definitions Lead Efforts to Evolt Abuse Lead Effor	e Definitions Around eporting Against to drive efforts that language and reach language and language and language and reach language and langua	Recommendation 11: As this related to the definition of DNS Abuse, we believe that it is highly important to elaborate more on the methodology and the validation mechanisms. The RrSG has concerns about this recommendation. The ICANN community is currently engaged in abuse and threat activities, as are the contracted parties. The definition of abuse and threats can be difficult to define broadly within a perhaps indictive why which have undertaining of implications of these activities, be involved in the process (rather than the ICANN board engaging only security-related community members). The GAC welcomes Recommendation of the exactivities, be involved in the process (rather than the ICANN board engaging only security-related community members). The GAC welcomes Recommendation of 1 on efforts to implement current community vetted definitions of DNS Abuse without delay and the need to ensure that definitions evolve to meet address DNS Abuse, including with the GAC support through its advice, comments, and correspondence. Although the GAC shares the overall goal of arbeiring dairly and consistency with regard to the definition of DNS Abuse and Security Phreats, it is not quite clear how the Recommendation in greater detail beloaue and Security Phreats, it is not quite clear how the Recommendation in greater detail beloaue and Security Phreats, it is not quite clear than the North Recommendation in greater detail beloaue and Security Phreats, it is not quite clear than the North Recommendation in greater detail beloaue and Security Recommendation in greater detail beloaue and Reporting Against Those Definitions and any related efforts to definition. The RyG does not think it is fassible or rea	Never said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes. Clarify explanation of underlying issue	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tipsten up wording and be explict. Add text on what process could look like. None Clarify explanation. This is clearly an issue: wholeinds, att, sart, etc. not our issue to solve but date facts. Clarify in explanation. Foolnote "vetted definition". Not in scope steeping the country of the process of the second process of the	Review whether more detailed implementation guidence is appropriate Clarify Clarify, add more detail	Agree hat ICANN Org. Agree with contention that such an abuse definition and more details on methodology and the content of t			
RrSG GAC IPC RySG	Lead Efforts to Evol Abuse and Enable fi 11 Those Definitions Land Efforts to Evol Abuse and Enable fi 12 Those Definitions 13 Those Definitions Lead Efforts to Evol Abuse and Enable fi 14 Those Definitions Lead Efforts to Evol Abuse and Enable fi 16 Those Definitions Lead Efforts to Evol Abuse and Enable fi 17 Those Definitions Lead Efforts to Evol Abuse and Enable fi 18 Those Definitions Lead Efforts to Evol Abuse SSR, and se contracts with confirmed abuse, SSR, and se contracts with confirmed to the c	e Definitions Around eporting Against to drive efforts that language and reach language and language and language and reach language and langua	BROCOMMENDATION TO A STATE OF THE PICE AND T	Mever said RrSG shouldn't be involved as part of community Disagree that a feasible and realistic abuse definition can't be achieved and evolved for ICANN purposes.	Check ISO and NIST Clarify community involvement Check relations 11.1, 11.3, 11.4—how does this make sense. Tipsten up wording and be explict. Add text on what process could look like. None Clarify explanation. This is clearly an issue: wholeinds, att, sart, etc. not our issue to solve but date facts. Clarify in explanation. Foolnote "vetted definition". Not in scope steeping the country of the process of the second process of the	Review whether more detailed implementation guidence is appropriate Clarify Clarify, add more detail	Agree hat ICANN Org implementation plans should provide details on methodology and validation. Misunderstood Rec.; as will all recovery the second of the s			

Service Servic										
Service of the control of the contro	Source Rec	Title	Comment	Preparer Comments	Actions	General Actions	Response			
Part		ICANN Board, in parallel, should								
A		evolving the DNS abuse definition (and								
Part		annlication) and adopt the additional term								
Part		and evolving external definition of "security threat"—a term used by the ICANN								
Part		project, and the GAC (in its Beijing								
The content of the		and addressed in international								
Company Comp		conventions such as the Convention on	/2 2 5) What are also add the CCD2 DT have in a start in the linear in a start and the	Chaife Daniela anno detail but antico anno detail an ta						
Series of the control		Notes" —to use in conjunction with	intended objectives of this particular recommendation given the imprecision of the term	trigger Staff objection that it's too detailed and						
Section 1. The control of the contro	SSAC	11.3 ICANN org's DNS Abuse definition.	"encourage community attention".	prescriptive	Clarify	Clarify	Clarified.			
The state of the s										
The state of the s		encourage community attention to evolving the DNS abuse definition (and								
March Company Compan		application), and adopt the additional term	In reviewing recommendations 11.2 and 11.3 together, the Board requests clarification as to							
March Company Compan		and evolving external definition of "security threat"—a term used by the ICANN	the intent of these recommendations and whether the SSR2 RT believes it prudent to "implement the SSR-relevant commitments (along with CCT and RDS recommendations).							
Service of the control of the contro		Domain Abuse Activity Reporting (DAAR)	based on current, community vetted abuse definitions, without delay", knowing that the							
Section of the control of the contro		project, and the GAC (in its Beijing	definition may/will evolve.		Bo commit to action on current					
Manual M		and addressed in international	implementation of this recommendation. It is not clear what the measure of success would be							
Part		conventions such as the Convention on	given that the Board cannot mandate the community to reach agreement on the definition of		abuse is not static). Rewrite to					
Section 1. Control of the control of		Notes" —to use in conjunction with	"DNS abuse". It is also not clear what the SSK2 K1 intends for the Board to do in "adopting" a definition. The Board believes that the issue is not about "abuse definition", but about what kind		ICANN's remit. Clarify what ICANN					
Part	ICANN Board		of DNS abuse is within ICANN's remit.	See actions >	cannot handle would actually help.	Clarify	Clarified.			
Part		ICANN Board, in parallel, should								
Part		evolving the DNS abuse definition (and								
Service of the control of the Contro		application), and adopt the additional term								
Prof. 1. Control Contr										
The contact of the co		Domain Ahuse Activity Reporting (DAAR)								
The contact of the co		project, and the GAC (in its Beijing								
Programment and south and				While it's clear RySG would prefer a never ending	That is true. Action is needed now					
		conventions such as the Convention on	The RySG believes this work is ongoing but objects to the conclusion of this Recommendation	conversation about abuse definition rather than abuse	plus community attn to evolving					
		Notes" —to use in conjunction with	as to which definition the Board should adopt. If 11.3 is to be included as a recommendation, the RySG would only support the text "ICANN Board should encourage community attention to	mitigation actions and accountability measures, that's not what SSR2 is recommending or what is needed to	definition. Need to clairly to specify how to get there and then have it					
Package Pack	RySG	11.3 ICANN org's DNS Abuse definition.	evolving the DNS abuse definition".	support internet SSR.	adopted.	Clarify	Clarified.			
Service of the control of the contro		The ICANN Board should entrust SSAC	-							
The control of processes of the control of proceses of the control of processes of the control of processes of the		and PSWG to work with e-crime and	underway with the formation of a DNS Abuse Work Party within SSAC SSAC would be banny	with contracted parties active role in "Abuse Work Party"						
The control of prices of the control of prices of the control of t		DNS Abuse, taking into account the	to brief the SSR2 RT on the objectives of this DNS Abuse Work Party. The SSR2 RT should	and SSAC's non-transparent, closed efforts. This is why		comments are going into				
The Control of the Co		processes and definitions outlined in the	consider whether to retain Recommendation 11.4 or simply note in the report that this activity is	PSWG needs a leading role and CPH involvement		different directions.				
And the field Content for the content of the conten	SSAC		underway within SSAC.	shouldn't be controlling this effort.	Schedule a talk with the group.	Comments show that	Clarified.			
Medical Control Contro		I DOMEST A STATE OF THE STATE O				divided on this. Crime is				
The Comment with the commentation of the private company (Action 1) and the commentation of the private commentati		abuse experts to evolve the definition of	The RySG believes this is a policy matter and outside the scope of SSR reviews - if the Board		This is a public safety issue. Remove	government business,				
The Comment with the commentation of the private company (Action 1) and the commentation of the private commentati		DNS Abuse, taking into account the	would like the community to try to define DNS abuse, then it can instruct the community to do		attack surface: what we meant is to	maybe others can chime				
The Comment of the commentation of the process	RySG	11.4 Convention on Cybercrime	and GAC) without input from the rest of the community.		11.3.?	that needs to act.				
and a second process of the control			The BC concurs with this recommendation but also initially encourages ICANN to begin with							
Contact Legal and Agronoution Across 12 Machements with MICE State Contact Legal and Agronoution Across 13 Machements with MICE State Contact Legal and Agronoution Across 14 Machements with MICE State Contact Legal and Agronoution Across 15 Machements with MICE State Contact Legal and Agronoution Across 16 Machements with MICE State Contact Legal and Agronoution Across 17 Machements with MICE State Contact Legal and Agronoution Across 18 Machements with MICE State Contact Legal and Agronoution Across 18 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contac			proactive review of registrar compliance with the Temp Spec. The Compliance team could	Noted. Suggest they start with action on Crossroads						
Contact Legal and Agronoution Across 12 Machements with MICE State Contact Legal and Agronoution Across 13 Machements with MICE State Contact Legal and Agronoution Across 14 Machements with MICE State Contact Legal and Agronoution Across 15 Machements with MICE State Contact Legal and Agronoution Across 16 Machements with MICE State Contact Legal and Agronoution Across 17 Machements with MICE State Contact Legal and Agronoution Across 18 Machements with MICE State Contact Legal and Agronoution Across 18 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contact Legal and Agronoution Across 19 Machements with MICE State Contac	BC	12 Mechanisms to WHOIS Data	start with review of redaction of data, easy-to-find reveal request policies on registrar websites and average response time to requests for registrant data.	to be discussed in Team meeting.	include examples in text	Clarify	Clarified			
Control Logic of Agriculture Services Control			,				Disagree. Among other things,			
active and count to employ with risk of the properties for amount of the properties for a mount				D: 4 " " " OOD4D !!!			It's an SSR1 Rec. which, in			
active and count to employ with risk of the properties for amount of the properties for a mount		Create Legal and Appropriate Access	#Recommandation 12: This recommendation is outside of the review team remit and is already	Disagree. Among other things, It's an SSR1 Rec. which, in addition to impact on SSR puts this in the team's	WHOIS is clearly SSR, should be stated. Might want to mention that this		addition to WHOIS documented impact on SSR puts this in the			
Beyond blassing causable and particularly and all administration in accessing Williams and compliance with a compliance with the compliance of the complete and	NCSG	12 Mechanisms to WHOIS Data	addressed by current ICANN Policymaking in the GNSO and thus should be removed.	remit.	is EPDP material.	Clarify	team's remit. Clarified			
Beyond blassing causable and particularly and all administration in accessing Williams and compliance with a compliance with the compliance of the complete and			ICANN's continued delay in facilitating a centrally-coordinated mechanism for standardized							
Beyond blassing causable and particularly and all administration in accessing Williams and compliance with a compliance with the compliance of the complete and			access to non-public registrant data is harming a range of legitimate causes, including law enforcement, security researchers, and intellectual property owners and consumers 1							
Service of the Control Control Legal and Approach Access to Model Service Serv										
Seption 12 declaration in Workfill Date de Construent (Construent de Construent de Con		Constant and and Americans	Beyond fostering scalability and predictability in all stakeholders' interests, developing such an	Natural and annual to annual mile state and a second						
Page 1 2 Accordance to WHICE Date The PipSG does not apport SSPC making the recommendation growth en companied and solices in the	WIPO	12 Mechanisms to WHOIS Data	disclosure requests.2	while noting the remit.	Note	Agree. Note	Agree.			
RyGO 1. Mechanisms to WHCHG Data 1. Mechani				-		_	Among other things, It's an SSR1			
Coate Lagal and Appropriate Access The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internation The NVS Case and Appropriate Access Management for the Internat				D: 4 " " " OOD4D !!!			Rec. which, in addition to			
The IF is a supported this recommendation, and decisiones are support for the month of the control of the second control of the seco		Create Legal and Appropriate Access	The RvSG does not support SSR2 making this recommendation given the oppoing EPDP	in addition to impact on SSR puts this in the team's			SSR puts this in the team's			
recommendation in grader datal below. In proporting in DISE Agree. No action The LAND Board should recommendation 19: Update Hamilton of New York Progress and September 10: In propose and the propose and the propose and the progress and the propose and the pr	RySG	12 Mechanisms to WHOIS Data	Phase 2 work and questions how this falls within the scope of this review.	remit.	WHOIS = SSR, ack epdp	Disagree. Clarify	remit. Clarified			
The IPC storogy agoint he IFT is recommendation that undersease Michaelman to Michael Storogy and September 1 in Temporal the Completeness and Utility of the Comman Agency Commission (24). But and Agency Commission (24). B			The IPC is supportive of this recommendation, and discusses its support for this							
Fig. 12 The LCAN Board should correct as legal and Appropriate No. 12 and addressing about the training for the proper addressing should be a correct and value for the proper addressing should be a			The IPC strongly supports the RT's recommendations that address investigating and							
thouse including Recommendation 12: "Operate Logal and Appropriate Access Nechosians to Ducks." SSRP Recommendation 12: "Operate and Policy of the Domain Access Activity of the Domain Activity of Committee (SAC), Downmental Activities of Comm										
Date - SRIZ Recommendation 12 - Establish and control Abusin Report Political Report Polit			abuse, including Recommendation 12: "Create Legal and Appropriate Access Mechanisms to							
Absolute Activity Absolute Act			Data," SSR2 Recommendation 13: "Improve the Completeness and Utility of the Domain							
SSO Teacommendation 19: "Update Handling of Abusive Naming." Recommendation 12 advantage and several part of the several part										
Advisory Committee (SAC), Bit, and IPC. It is important to the size of the siz										
WHOS data addresses issues naised by many in the community including the Security and Shabilty Committee (SAC), Ex. and PL. it is important to the issue of addressing abuse the registrant data is correct, and available through the proper addressing abuse that registrant data is correct, and available through the proper addressing abuse that registrant data is correct, and available through the proper addressing abuse that registrant data is correct, and available through the proper addressing abuse that registrant data is correct, and available through the proper address of the size addressed of the state addressed of the size addressed with considering the generality of the rest. The ICANN Board should create a legal and appropriate access mentions and the develved problems such as legal and appropriate access mentions for the properties access mentions for the properties access mentions to WHOS date by whele parties auch as level and an advised. The ICANN Board should create a legal and appropriate access mentions for the properties access mentio			SSR2 Recommendation 19: "Update Handling of Abusive Naming." Recommendation 12							
Stability Advoory Committee (SAC), Governmental Advisory Committee (GAC), BC, and IPC. It is a susue of addressing abuse that registrant data is correct, and available through the proper observed for the first of the sause of addressing abuse that registrant data is correct, and available through the proper observed for the commendation of the proper authorities of charmeter of charmeter of the proper authorities of the proper aut			addressing WHOIS data addresses issues raised by many in the community including the Security and							
IPC 12 The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance when considering the penerally of the group report and the proper authorities. The ICANN Board should create a legal and appearance when considering the penerally of the group report and the proper authorities. The ICANN Board should create a legal and appearance to the state of the proper authorities. The ICANN Board should create a legal and appearance to the state of the proper authorities. The ICANN Board should create a legal and appearance to the state of the proper authorities. The ICANN Board should create a legal and appearance to the state of the proper authorities. The ICANN Board should create a legal and appearance to the state of the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to take into account the existing activities in this area. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the proper authorities. The ICANN Board should create a legal and appearance to the properation and appearance to the p			Stability							
sisse of addressing abuse that registrant data is correct, and available through the proper and change of the content of the proper attributes. The ICAN Board ahoud create a legal and appropriate access mechanisms to WHOS date by veterior and proper attributes and appropriate access mechanisms to WHOS date by veterior and proper attributes and appropriate access mechanisms to WHOS date by veterior and the diversity of bodies that enforce national regulations. How could ICAN board a should create a legal and appropriate access mechanisms to a law interest and the diversity of bodies that enforce national regulations. How could ICAN board and the object of the interest and the diversity of bodies that enforce national regulations. How could ICAN board a hours of the easiting activities in this area. The ICAN Board should create a legal and appropriate access mechanisms to a proper attribute and proper attributes and a set of the interest and the diversity of bodies that enforce national regulations. How could ICAN board a hour of its reproduction of the easiting activities in this area. REGIO 12.1 enforcement. REGIO 12.2 Specification for gTLD Registration Data responsibility for, and ensure ICAN sour of the commendation of the expensibility of proper and the commendation of the expensibility of the commendation of the proper and the commendation of the expensibility of the commendation of the expensibility of the commendation of the commendation of the proper and the commendation of the commendatio			Advisory Committee (SSAC), Governmental Advisory Committee (GAC), BC, and IPC. It is important to the							
the LCANN Board should create a legal and appropriate access mechanisms to WHOS data by vetted parties such as less in the context of the important and the diversity of bodies that enforcement. The LCANN Board should create a legal and appropriate access mechanisms to WHOS data by vetted parties such as less in the context of the implementation of this recommendation. This general recommendation appears not to take into account the existing activities in his account the existing a			issue of addressing abuse that registrant data is correct, and available through the proper				Noted and the issue addressed			
The ICANN Board should create a legal and appropriate access mechanisms to interest of the first of unintended consequences when consequences and the diversity of bodies that enforce national regulations. How could ICANN appears not to take into account the existing activities in this area. The ICANN board hould create a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served as a legal and appropriate vacation may be a served of the commendation of the served and appropriate vacation may be a served of the commendation of the served and of the served part of the served and of the served part of the se	IDC		channels or to		Name	Agree. No action	has been streamlined with other			
SAC 21.1 enforcement. The ICANN Board should create a legal and appropriate access mechanisms to WHOS data by vetted parties such as law minimize such risks in the context of the implementation of the intercomment in the inte	IPC	12	the proper authorities.	wniie noting the remit.	None	needed	related recommendations.			
SAC WHOIS data by vetted parties such as law minimize such risks in the context of the implementation of the incommendation. This general recommendation of this recommendation. The ICANN Board should create a legal and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board should create a legal and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board should rate. The ICANN Board should take and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board to the subject to another PCP. The ICANN Board should take and the ICANN Board to the subject to another PCP. The ICANN Board thought to the ICANN Board to the subject to another PCP. The ICANN Board thould take another the ICANN Board to the subject to another PCP. The ICANN Board thould take another the ICANN Board to the subject to another PCP. The ICANN Board thould take another the ICANN Board to the ICANN Board to the ICANN Board to the ICANN Board to lend its support to this issue. The ICANN Board thould take another the ICANN Board to lend its support to this issue. The ICANN Board to the ICANN Board to lend its support to the ICANN Board to lend its support to this issue. The ICANN Board to the ICANN Board to lend its support to the ICANN Board to		The ICANN Board should create a lengt	(3.3.7) The SSAC largery agrees with the intent of this recommendation, while noting that this measure admits the risk of unintended consequences when considering the generality of the							
SAC WHOIS data by vetted parties such as law minimize such risks in the context of the implementation of the incommendation. This general recommendation of this recommendation. The ICANN Board should create a legal and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board should create a legal and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board should rate. The ICANN Board should take and appropriate access mechanisms to WHOIS data by vetted parties such as law of the ICANN Board to the subject to another PCP. The ICANN Board should take and the ICANN Board to the subject to another PCP. The ICANN Board thought to the ICANN Board to the subject to another PCP. The ICANN Board thould take another the ICANN Board to the subject to another PCP. The ICANN Board thould take another the ICANN Board to the subject to another PCP. The ICANN Board thould take another the ICANN Board to the ICANN Board to the ICANN Board to the ICANN Board to lend its support to this issue. The ICANN Board thould take another the ICANN Board to lend its support to this issue. The ICANN Board to the ICANN Board to lend its support to the ICANN Board to lend its support to this issue. The ICANN Board to the ICANN Board to lend its support to the ICANN Board to		and appropriate access mechanisms to	Internet and the diversity of bodies that enforce national regulations. How could ICANN		l		Noted and more specific			
The ICANN Board should create a legal and appropriate access mechanisms to WHOS data by veter parties such as law of the PPP. RYSG 12.1 enforcement. The ICANN Board should take responsibility for, and ensure ICANN Board should take responsibility for, and ensure ICANN Board should take responsibility for and ensure ICANN Board should remove a pecific language included in excommendation 12.2, as indicated previously, there is a pending IRT that is dealing with more important period in the ICANN Board should remove a pecific language included in excommendation 12.2, as indicated previously, there is a pending IRT that is dealing with more important period in the ICANN Board should remove a pecific language included in excommendation 12.2, as indicated previously, there is a pending IRT that is dealing with more important period in the ICANN Board to lend its support of the Domain Albuse Actively Reporting and oversight to the source) of the Domain Albuse Actively Reporting and oversight of the Domain Albuse Actively Reporting and albuse and also researches. How can the 2	SSAC	WHOIS data by vetted parties such as law	minimize such risks in the context of the implementation of this recommendation? This		Address consequences, confirm		language included in			
The ICANN Board should create a legal and appropriate access mechanisms and propriate access m		unorounding	garantees and the state of the	Noted but not in agreement for its removal given the						
RSG 121 effoctivement. Such as yveited parties such as law Regarding recommendation 12.1, this is currently being addressed by EPDP Phase 2, and specially fix an end of the subdivide the subject to another PDP. RSG 12.2 Specification of the Temporary of the Completeness and Utility of the Domain Abuse Activity Reporting 13 Program and encourages the ICANN Board to lend its support of the Domain Abuse Activity Reporting 13 Program and encourages the ICANN Board to lend its support of the Domain Abuse Activity Reporting 14 Program and also researches. How can this provide the activities of the Temporary of the Domain Abuse Activity Reporting 15 Program and also researches. How can the producted in support of the Domain Abuse Activity Reporting 15 Program and encourages the ICANN Board to lend its support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also rese				steps being taken for the EPDP and need for consensus.						
RSG 121 effoctivement. Such as yveited parties such as law Regarding recommendation 12.1, this is currently being addressed by EPDP Phase 2, and specially fix an end of the subdivide the subject to another PDP. RSG 12.2 Specification of the Temporary of the Completeness and Utility of the Domain Abuse Activity Reporting 13 Program and encourages the ICANN Board to lend its support of the Domain Abuse Activity Reporting 13 Program and encourages the ICANN Board to lend its support of the Domain Abuse Activity Reporting 14 Program and also researches. How can this provide the activities of the Temporary of the Domain Abuse Activity Reporting 15 Program and also researches. How can the producted in support of the Domain Abuse Activity Reporting 15 Program and encourages the ICANN Board to lend its support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also researches. How can the support of the Domain Abuse Activity Reporting 15 Program and also rese				There can be a reference to the process as a noting and			Noted and more specific			
RrSG 12.1 enforcement. The IcCNNN Board should take responsibility for, and ensure ICANN or processing the image of the Internation of the Temporary in planementation of the Temporary in the Concurs with the Temporary in the Concurs with the Temporary in the Domain Albase Activity Reporting 13 Program BC 13.1 Program BC 13.1 Program SC 14.2 enforcement. The IcCNNN Board in Dute subject to another PCP. Commentation of the Temporary in Commendation 12.2 as indicated previously, there is a pending IRT that is dealing with internation of the Temporary in Commendation 12.2 as indicated previously, there is a pending IRT that is dealing with the Indicated previously, there is a pending IRT that is dealing with the Indicated previously, there is a pending IRT that is dealing with the Indicated previously, there is a pending IRT that is dealing with the Indicated previously, there is a pending IRT that is dealing with the Indicated previously, there is a pending IRT that is dealing with the Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is dealing with Indicated previously, there is a pending IRT that is		WHOIS data by vetted parties such as law	Regarding recommendation 12.1, this is currently being addressed by EPDP Phase 2. and	specifically addressed.(https://www.icann.org/public-			language included in			
responsibility for, and ensure ICANN Orgones to immediate closure on, implementation of the Temporary of the Domain Abuse Activity Reporting the Domain Abuse Activity Reporti	RrSG	12.1 enforcement.	should not be subject to another PDP.	comments/epdp-phase-2-initial-2020-02-07-en)	Word this as SSR inpout to this issue.		recommnedations.			
comes to immediate closure on, implementation of the Temporary Internet the Empropracy Internet Intern		The ICANN Board should take								
implementation of the Temporary 12.2 Specification for STLD Registration Data. RSG 12.3 Specification for STLD Registration Data. The BC concurs with his recommendation. The DAR program is one of unrealized podertial. Excellent well, DAR would have the capability of informing LORNN (and the community) with precision regarding the source(s) of abusive behavior, making it easier to enlist the cooperation of the Domain Abuse Activity Reporting 13 Regular of the Domain Abuse Activity Reporting 14 Regular of the Domain Abuse Activity Reporting 15 Regular of the Domain Abuse Activity Reporting 16 Regular of the Domain Abuse Activity Re		comes to immediate closure on	For recommendation 12.2, as indicated previously, there is a pending IRT that is dealing with				Noted and more specific			
The BC concurs with his recommendation. The DAAR greed The BC concurs with his recommendation. The DAAR greed The BC concurs with his recommendation. The DAAR greed and product of the Completeness and Utility of the Domain Abuse Activity Reporting 13 Program The BC concurse ship is recommendation. The DAAR greed and product of the Domain Abuse Activity Reporting of a business of the Domain Abuse Activity Reporting The BC concurse ship is recommendation. The DAAR greed and so researches. How can this account of the Domain Abuse Activity Reporting The BC concurse with his recommendation. The DAAR greed and the Concurse of the Domain Abuse Activity Reporting The BC concurse with his recommendation. The DAAR greed and the Concurse of the Domain Abuse Activity Reporting The BC concurse with his recommendation. The DAAR greed and the Concurse of the Domain Abuse Activity Reporting The BC concurse with his recommendation. The DAAR greed and the Concurse of the Domain Abuse Activity Reporting The BC concurse with his recommendation. The DAAR greed and the commendation of the Domain Abuse Activity Reporting The BC concurse with the source is a mingrower and the commendation of the Domain Abuse Activity Reporting The BC concurse with the source is a mingrower and the commendation of the Domain Abuse and the commendation of the Domain Abuse and the Concurse of the Domain Abuse and so researches. How can this add so researches. How can the add so researches. How can the support of the Domain Abuse and so researches. How can the support of the Domain Abuse and the Domain Abuse and the Concurse of the Domain Abuse		implementation of the Temporary	complex issues. The IRT should be allowed to proceed at its current pace to ensure quality	Noted. Suggested approach need to be discussed in			language included in			
Excuted well, DARx would have the capability of informing (CANN (and the community) with perceivance regions reparting the source(s) of abusive behavior, making it easier to relist the opporation of the community with perceivance of the power of the po	RrSG	12.2 Specification for gTLD Registration Data.	outcome (rather than rushing to meet an artificial deadline).	Team meeting.			recommnedations.			
BC 19 Domain Abuse Activity Reporting an improved and robust DAAR program, and encourages the ICANN Board to lend its support 13 Program and conscipt to the both Program and encourages the ICANN Board to lend its support 14 Program and encourages the ICANN Board to lend its support 15 Program and encourages t			The BC concurs with this recommendation. The DAAR program is one of unrealized potential. Executed well, DAAR would have the capability of informing ICANN (and the composite) with							
BC 19 Domain Abuse Activity Reporting an improved and robust DAAR program, and encourages the ICANN Board to lend its support 13 Program and conscipt to the both Program and encourages the ICANN Board to lend its support 14 Program and encourages the ICANN Board to lend its support 15 Program and encourages t			precision regarding the source(s) of abusive behavior, making it easier to enlist the cooperation							
BC 13 Program and oversight to the effort. BC agrees no action needed Agreed Improve the Completeness and Utility of the Promise Asses Activity Reporting (5) We recommend that the SSR2 make clear that rate limiting is an innectiment in the DAAR be solved? (See the Title beard in on?)			of contracted parties in mitigation efforts. The BC encourages ICANN Org to invest further in							
Improve the Completeness and Utility of the Pomain Aluse Activity Reporting (5) We recommend that the SSR2 make plear that rate limiting is an impediment to the DAAR be solved? (Such to the board in sort?	BC	13 Program	an improved and robust DAAR program, and encourages the ICANN Board to lend its support and oversight to the effort.	BC agrees	no action needed		Agreed			
the Domain Ahuse Activity Reporting (5) We recommend that the SSR2 make clear that rate limiting is an impediment to the DAAR				-	Mention rate limiting for anti abuse					
Into Lourismi Auditor Pacification (1) by the recommend mat the 3-Str., make one mat raise as manage an impediment to the Lowest (b) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (c) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (d) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (d) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (d) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (d) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (d) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (d) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (d) we recommend mat the 3-Str., make one mat raise imming is an impediment to the Lowest (d) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an impediment to the Lowest (e) we recommend the str., make one mat raise imming is an imming		Improve the Completeness and Utility of	(F) W		and also researchers. How can this					
e present a memory in memorinary report registers and an income an indicated in the control of t	M3AAWG	tne Domain Abuse Activity Reporting 13 Program	(a) we recommend that the SSKZ make clear that rate limiting is an impediment to the DAAR system's ability to accurately report registrar statistics.	Accept		Add to report	Agreed, Added			
			.,,,	1 4						

					1				
Source Rec	Title	Comment (3.3.8) It is unclear if "completeness" here refers to the limited realm of second level domain	Preparer Comments	Actions	General Actions	Response			
		(3.3.8) It is unclear if "completeness" here refers to the limited realm of second level domain names in gTLDs. If the intent is a far broader scope of "completeness" including all top-level							
		report indicated how such an extension of this activity could take place. Also, the draft report should clearly indicate what is actionable with the specific recommendations, and more							
			Want further clarification, what's actionable, how to			Noted: more details added.			
	Improve the Completeness and Utility of	Reporting (DAAR) reports, and what should be made public, needs further attention in this recommendation. The SSAC suggests that further consultation within the ICANN community on	measure effectiveness. who should get reports. SSAC			SSR2 also recommends that			
SSAC	the Domain Abuse Activity Reporting 13 Program	recommendation. The SSAC suggests that further consultation within the ICANN community on DAAR methodologies would be helpful.	should have done this already, but I guess it falls to SSR2 to do the work	Clarify, Add details	Clarify, Add details	SSAC bring more attention and quidance to this.			
SSAC	13 Flogiani	To the extent ICANN would consider LIDRP cases as part of any DAAR or Domain Name	SSR2 to do the work	Clarity. Add details	Ciarry. Add details	guidance to tris.			
		Marketplace Indicators, it should be noted that while the UDRP supports consumer trust, this is trust earned only after significant time and expense is invested by brand owners (and in some							
		trust earned only after significant time and expense is invested by brand owners (and in some							
		UDRP, as operated by WIPO on a not-for-profit basis, moreover benefits Contracted Parties							
		cases only after a fraud has been perpetrated on end users). The continued availability of the UDP, as operated by WIPO on a not-for-profit basis, moreover benefits Contracted Parties and ICANN by keeping them out of disputes. The fact that WIPO has seen record-breaking							
	Income the Completeness and I will to a	numbers of UDRP cases over the years illustrates that the root issue of cybersquatting is not itself being addressed.							
	Improve the Completeness and Utility of the Domain Abuse Activity Reporting	_							
WIPO	13 Program	To this end ICANN may wish to look at programs instituted in the .EU and .DK domain spaces.		Ask WIPO for more info	Unclear yet	Noted. **action pending			
			(kc has clarification from ICANN Org on exactly what is						
			underway and how they are measuring its effectiveness.) Clearly ICANN has not met its own objectives of "develop						
			final a robust reliable reproducible and replicable						
			methodology for analyzing security threat activity that can then be later used by the ICANN community to facilitate						
			informed policy decisions." DAAR falls far short of this goal in practice and lacks sufficient						
			goal in practice and lacks sufficient information to be able to tel, for example, which registrars						
	Improve the Completeness and Utility of the Domain Abuse Activity Reporting	the SSR2 RT's intent is to recommend implementation of something beyond what is in	or registries are harboring significant abuse, which kinds,						
ICANN Org	13 Program	Work is already underway by ICANN org towards implementation of this recommendation. If the SSR 2RTs intent is to recommend implementation of something beyond what is in progress with ongoing work, ICANN org encourages the SSR2 RT to provide specific details.	etc.	TBD	Clarify (kc input needed)	Clarified			
		The IPC is supportive of this recommendation, and discusses its support for this							
		recommendation in greater detail below. The IPC strongly supports the RT's recommendations that address investigating and							
		responding to DNS							
		abuse, including Recommendation 12: "Create Legal and Appropriate Access Mechanisms to WHOIS							
		Data." SSR2 Recommendation 13: "Improve the Completeness and Utility of the Domain							
		Ahuse Activity							
		Reporting Program (DAAR)," SSR2 Recommendation 17: "Establish a Central Abuse Report Portal," and							
		SSR2 Recommendation 19: "Update Handling of Abusive Naming."							
		As for the DAAR, the IPC commends ICANN's intended goal of "develop[ing] a							
		robust, reliable, reproducible, and replicable methodology for analyzing security threat activity							
		that can							
		then be later used by the ICANN community to facilitate informed policy decisions." However, the RT's							
		assessment finds that the DAAR falls far short of this goal in practice because it lacks sufficient							
		information to be able to tell which registrars or registries are harboring significant abuse. The							
		supports the RT's recommendation to include this critical data and turn the DAAR into a							
		nowerful tool for							
		accountability and transparency in the domain name registration system.							
		The IPC does however note that a number of brand owners now operate Brand TLDs under							
		Specification 13, in which, due to the nature of these TLDs, the risk of DNS abuse is low. In making		recommend avoid imposing					
		recommendations		unnecessary and costly burdens on Brand TLDs. In					
		that seek to impose additional obligations for monitoring and reporting, the IPC would urge the		Brand TLDs. In					
		RT to acknowledge differing risk profiles and avoid imposing unnecessary and costly burdens on		particular, this might include different requirements for access to Brand TLD	,				
		Brand Ti Ds. In		zone files through the CZDS,					
		particular, this might include different requirements for access to Brand TLD zone files through the CZDS		different security threat monitoring and reporting requirements, and					
		different security threat monitoring and reporting requirements, and different audit approaches		different audit approaches with					
IDC	13	with		respect to maintaining the security of a Brand TLD.	Clarify	Agreed. Clarified.			
IPC	The ICANN Board and ICANN org should	respect to maintaining the security of a Brand TLD.	agrees	a Brand TLD.	Clarity				
	work with the entities inside and outside					Disagree. Aggregating and republishing data IS within			
	the ICANN community that are mitigating	December 1991 And Admin data in classic below to blood about the standard		cite actual documentation that daar is					
	abuse to improve the completeness and utility of DAAR, in order to improve both	Regarding recommendation 13.1, this data is already being published elsewhere. It is outside of ICANN's scope to aggregate and republish this data. It is also not clear that DAAR is	Aggregating and republishing data IS within ICANN's	incomplete/ineffective. explain how cost outweighs benefit. explain R&Rs		comments, among others, for input on how DAAR falls short, is			
	measurement and reporting of domain		scope; see IPC, BC comments as one of many	will inherently resist accountability for		incomplete and ineffective. More			
RrSG	13.1 abuse.	additional resources outweighs any benefit.	explanations of how DAAR is incomplete and ineffective.	abuse.	Add more explanation.	information added.			
	The ICANN Board and ICANN org should					Disagree. Available information indicates a lack of outreach			
	work with the entities inside and outside the ICANN community that are mitigating					outside the ICANN community.			
	the ICANN community that are mitigating		Based on publicly available comments, ICANN Org has			and a lack of follow-through on			
	abuse to improve the completeness and utility of DAAR, in order to improve both		repeatedly failed to follow thru on DAAR-related requests. Soliciting input is not the same thing as working	Reinforce action and outreach in		input from non-contracted parties whowant to improve both			
	measurement and reporting of domain	ICANN org solicits input from all stakeholders on how to improve DAAR on a regular basis,	requests. Soliciting input is not the same thing as working with entities fighting abuse to improve DAAR, this mailing	terms hopefully ICANN staff will		measurement and reporting of			
ICANN Org	13.1 abuse.	including via daar@icann.org and the "DNS abuse measurements" mailing list	list doesn't have any traffic right?	understand.	Add more explanation.	domain abuse.			
		The RySG notes that the ONLY entities that can take down domain name abuse are: registries,				Abuse take downs are a separte issue from measurement and			
		registrars, hosts, and registrants. There are no third parties that mitigate abuse; only third party	Abuse take downs are a separte issue from	Check explanation to see if further		reporting of abuse; we'll seek to			
RySG	13.1	tools that analyze data and report on that data.	measurement and reporting of abuse	calrification is needed.	< see	clarify			
	ICANN Board should annually solicit and publish feedback from entities inside and								
	outside the ICANN community that are								
	mitigating abuse in order to help enhance ICANN org's data on domain abuse	This appears to be duplicative of 13.1. ICANN org encourages the SSR2 RT to clarify the							
ICANN Org	13.2 activity.	differences in these two recommendations.	Merge, remove duplication	merge 13.1,13.2	< see	Clarified			
	Enable Rigorous Quantitative Analysis of the Relationship Between Payments for				1				
	the Relationship Between Payments for Domain Registrations and Evidence of	While the BC historically has discouraged ICANN Org from engaging on matters of pricing,							
BC	Domain Registrations and Evidence of 14 Security Threats and Abuse	thisdata could be informative and helpful in identifying and targeting sources of DNS abuse. The BC supports.	Agrees w/ Team	no action	no action	Agreed			
			-			Collecting and analyzing data			
						related to price is completely separate from "regulation" or			
						separate from "regulation" or ICANN being a "regulator" and			
						ICANN being a "regulator" and there has been no Team			
			Collecting and analyzing data related to price is			suggestion relating to "market- based pricing." Enough			
		(3.3.9) Given that ICANN has deliberately distanced itself from any role as a regulator of pricing	completely separate from "regulation" or ICANN being a			questions have been raised			
		in this space and holds a position where market forces determine pricing, then what is the context of this analysis and how could such a rigorous quantitative analysis inform the	"regulator" and there has been no suggestion relating to "market-based pricing." Enough questions have been			about the relationship between registration payments and abuse			
	Enable Rigorous Quantitative Analysis of	mechanisms of market-based prining? Further elaboration of the envisaged use of such an	raised about the relationship between registration			to warrant quantitative analysis			
	the Relationship Between Payments for Domain Registrations and Evidence of	analysis would be useful to understand the intended effect of this recommendation. If this recommendation is an oblique reference to heavily discounted prices being applied to bulk	payments and abuse to warrant quantitative analysis. The "use" is factual information and a more			The "use" is factual information			
SSAC	Domain Registrations and Evidence of 14 Security Threats and Abuse	recommendation is an oblique reference to heavily discounted prices being applied to bulk name registration practices, then is the underlying abuse issue pricing or bulk registration?	The "use" is factual information and a more comprehensive understanding of DNS abuse.	Clarify. further elaorate intended effect.	Clarify	and a more comprehensive understanding of DNS abuse.			
		The BrSC notes that this was already recommended by CCT. The ICANN board deferred	and a property of the same of			and a property of the second o			
		implementing and stated "questions raised regarding the value of the data" (see https://www.icann.org/en/system/files/files/resolutions-final-cct-recs-scorecard-01mar19-en.pdf).							
						See above. There's value in this			
		It is not clear what will be accomplished by collecting this information. There are extensive reports already that tie low cost, or free registrations to abuse activity (which are havens for				data for those studying and fighting abuse across sectors. As			
	Enable Riporous Quantitative Analysis of	reports arready that tie low cost, or free registrations to abuse activity (which are havens for				a stoward for the DNS this falls			
	the Relationship Between Payments for	abusive domains, along with low cost hosting). Additionally, ICANN is likely not in a position to determine a full picture due to the large and varying promotional pricing, or prices set by resellers of registrars, or for registrars that do not provide this information publicly. This could				squarely in ICANN's remit and			
	Domain Registrations and Evidence of	resellers of registrars, or for registrars that do not provide this information publicly. This could				should be done by experienced,			
RrSG	14 Security Threats and Abuse	be a massive undertaking which might not produce useful information.	See above	See ahove	Disagree; Clarify	external researchers			

		-	I			-			
Source Rec	Enable Rigorous Quantitative Analysis of	Comment	Preparer Comments	Actions	General Actions	Response			
	the Relationship Between Payments for	Part of any meaningful look at payments for domains used to perpetuate abuse would also look	0-14-154 0-144-14-15		Astronomical 111				
WIPO	Domain Registrations and Evidence of 14 Security Threats and Abuse	at data accuracy under the umbrella of anti-fraud know-your-customer norms (which would in turn call for a timely resolution of PPSAI independent of EPDP work).	Good point. Should add privacy/proxy implementation (PPSAI) to Rec 12 on WHOIS EPDP	< see	Acknowledge, add to Rec 12	Agreed			
		The RySG does not support this recommendation as it is out of SSR2's remit. The RySG notes							
	Enable Rigorous Quantitative Analysis of	that ICANN is not a price regulator and is unclear what benefit would come from this research. Further, the RySG is concerned that this recommendation presupposes a relationship between	regarding the difference between analysis and regulation, and benefits of research. The "registration experts"						
	the Relationship Between Payments for Domain Registrations and Evidence of	the price of domain names and evidence of "security threats and abuse". The RySG refers to its previous comments on collecting pricing data made in response to the CCT-RT Final	RrSG says "There are extensive reports already that tie low cost, or free registrations to abuse activity (which are	@@heather can you go get those					
RySG	14 Security Threats and Abuse	Report, particularly recommendations 2, 3, and 4.	havens for abusive domains"	include in report.	Disagree, clarify	Disagree & clarify. per above			
IPC	14	The IPC is supportive of this recommendation.		no action needed	No action	Agreed			
						It is, in part, becasue of the work and recommendations of the CCT Review team, and the			
		The Board notes that this recommendation seems to raise similar questions the Board noted	Enough statements and questions have been raised			CCT Review team, and the Board's lack of follow through			
		when considering recommendations from the CCT Review Team about collecting pricing data	about the relationship between registration payments and			Board's lack of follow through that reinforced our inclusin of this recommendation. We hope the			
		The Board notes that this recommendation seems to raise similar questions the Board noted when considering recommendations from the CCT Review Team about collecting pricing data (see page 4 of the scorecard with regard to CCT recommendations 3 and 4). With regard to the relevant CCT Review Team recommendations, the Board placed them in 'Pending' status, and directed LCANN org, through engagement of a third party, to conduct an analysis to identify	quantitative analysis. The "use" is factual information and			Board will take this			
						recommendation more seriously this time and act on it. As noted			
	ICANN org should collect, analyze, and	whether that data is available, and how it could be collected in order to benefit the work of future CCT Review Teams. The Board stated that this analysis would inform the Board's	report was submitted with a related recommendation and there has been no reported follow-up, which indicates			above, this needs to be reinforced as an SSR priority and			
	publish pricing data to enable further independent studies and tracking of the	decision on next steps and whether the recommendations could be adopted. Given this	that this needs to be reinforced as an SSR priority and	Provide more explanation. Address		given the attention and action it deserves by the Board and			
ICANN Board	14.1 relationship between pricing and abuse	background, the Board would like to understand whether the SSR2 RT has considered the Board's previous concerns and how that has been factored into its deliberations.	given the attention and action it deserves by the Board and ICANN Org.	board concerns by exaplaining our position.	More explanation.	ICANN Org.			
		While the IPC is strongly supportive of the intent behind recommendation 14.1, it notes that							
		new gTLD registries are not under a contractual obligation to disclose their wholesale pricing and that efforts to gather this information from registries voluntarily during previous reviews (such as CCT) and PDPs (such as RPMs) have been unsuccessful. The RT is encouraged to							
			Agree that this should also be considered but note that ICANN Org, in the last negotiation over changes to the base new gTLD registry agreement, deleted a requirement for Registries to share pricing data with						
		obligations during contract renewal/contract negotiations to disclose pricing information on a confidential basis for the use by RTs and PDPs and/or for Org to consider whether registrar	base new gTLD registry agreement, deleted a						
IPC	14.1	retail pricing can meaningfully inform this issue.	ICANN.	Change text to incorporate.	Agree. Add text	Agreed; incorporated			
		The BC concurs with this recommendation. The BC underlines its previous comments(dating back to input on the CCT review team's findings in late 2018) regarding the establishment of							
		believes the problem of abuse is acute enough, and growing fast enough, to warrant such a system, and encourages the contractual changes. For the same reason, the BC agrees with							
		With regard to the suite of recommendations under 15.3, the BC concurs here as well – particularly 15.3. The European Union's (EU) General Data Protection Regulation (GDPR) has decimated the investigatory value of the Whois database. The BC reiterates its many inputs							
		right given to ICANN as a compliance matter 15.4 also is a particularly useful recommendation in that it seeks to codify in contracts the							
	Estate Control 17 B 11								
	Registries to Incent the Mitigation of DNS	applicated the several contracted parties who voluntarily have adopted a framework for addressing abuse, the situation unfortunately requires assertive mandates as a way of truly							
BC	15 Abuse	rooting out abuse.	no action needed	none	none	Agreed; incorporated			
	SSR2 RT found that the publications,	(intro) We concur with the SSR2 RT assertion that "the publications, statements, and related actions by the ICAMN organization have consistently understated or omitted the impact of systemic abuse of the DNS and its use as a platform for launching systematic attacks on							
	org have consistently understated or omitted the impact of systemic abuse of	organization to be transparent and to exercise its ability "to negotiate, enter into and enforce							
	launching systematic attacks on individual	(See ICANN Bylaws, Article 1, Mission at https://www.icann.	agreed; negotiations recommendation included above;						
M3AAWG	15 and organizational systems worldwide.	individual and utigalizational systems without the first product and utilities of the cavity organization to be transparent and to exercise its ability "to negotiate, reter into and enforce agreements, including public interest commitments, with any party in service of its Mission" (See ICANN Sylvay, Article 1, Mission at https://www.icann. org/resources/pages/governance/bylaws-en/#article1).	and see note below	Use that cite. Clarify per below Clarify ICANN should use process	add cite	Agreed; incorporated			
				where community provides input, data on stuff that matters, consultation	3				
				should be more regular, some					
M3AAWG	15	(3) We recommend that the SSR2 RT urge ICANN to adopt a contract negotiation process in which the influence of contracted parties who pay fees to ICANN cannot be held in question.	Agreed	documentation should be provided, compare CISO comment.	Clarify	Agreed; incorporated			
MSAAVVG	15	(4) We urge the SSR2 RT to recommend that contracted parties be obligated by contract to	Agreed	compare CISO comment.	Clarity	Agreed, Incorporated			
		accommodate the high-volume needs of operational security users. Mechanisms such as whitelisting, vetting or pre-authorization which unfairly encumber academics, individuals who responsibly investigate abuse, and generally any party who has legitimate purposes to collect							
M3AAWG	15	responsibly investigate abuse, and generally any party who has legitimate purposes to collect registration data, should not be used	Agreed	Incorporate. Vetting and whitelisting	Add	Agreed: incorporated			
M3AAWG	Enhance Contracts with Registrars and		Agreed	with logging	Add	Agreed; incorporated			
SSAC	Registries to Incent the Mitigation of DNS	(3.3.10) This appears to be a more detailed and clearer restatement of Recommendation 10.3, and in this light Recommendation 10.3 appears to be somewhat unnecessary.	Merging Recs	Merge recs.	Marging Recs	Agreed: incorporated			
SSAC	15 Abuse	and in this light Recommendation 10.5 appears to be somewhat unnecessary.	werging recs	Review team can recommend to	Marging Recs	Agreed, Incorporated			
				board to include guidance and objectives in negotiations and					
				processes to improve community					
				input into negotiations, transparency of negotiations, and outcomes that		Team has recommended actions (that are within our Bylaws-			
	Enhance Contracts with Registrars and Registries to Incent the Mitigation of DNS 15 Abuse	It is the position of the RrSG that contract negotiations should originate through ICANN, the RrSG, and the RySG, rather than a review team. Any recommendations for changes to the	Disagree and the Bylaw mandate of this review places	serve the public interests (not to be confused with the interests of		mandate and scope) to improve SSR and serve the public			
RrSG	15 Abuse	RAA or RA are out of scope.	this matter within SSR2's scope.	Registrars, Registries, or ICANN Org)	None	interest.			
	Enhance Contracts with Registrars and	ICANN could consider incentives such as "audit credits" to incentivize adoption of best							
WIPO	15 Abuse	practices.	Discuss	Discuss	?	Consdering			
		The SSR RT has no authority to make recommendations to enhance or make changes to the Registry or the Registrar Accreditation Agreements and strongly objects to this set of							
		Registry or the Registrar Accreditation Agreements and strongly objects to this set of recommendations. Similarly, the ICANN Board has no authority to implement the recommendation/s. The RySG opposes this recommendation because it presupposes the				Discoura The said			
						Disagree. The review team gives recommendations to the board			
		preempt (and end-run around) work being done in the community and by other PDPs, such as the EPDP. Furthermore this recommendation is wholly outside the scope of the SSR2's rentle (e.g. setting threshold to trigger 'automatic' contract defaults). Perhaps the scope of SSR3 will	Review team can recommend to board to include guidance and objectives in negotiations and processes to			on how to approach future contract negotiations. Team has			
	Enhance Control with Danie:	(e.g. setting threshold to trigger "automatic" contract defaults). Perhaps the scope of SSR3 will	improve community input into negotiations, transparency						
	Enhance Contracts with Registrars and Registries to Incent the Mitigation of DNS	be to review the outcome of the various work in progress today, but this RT is not tasked with using the Recommendations of the RT to hammer home viewpoints on how the Board and the	of negotiations, and outcomes that serve the public interests (not to be confused with the interests of	Clarify this is future-looking, no unil.		within our Bylaws-mandate and scope) to improve SSR and			
RySG	15 Abuse	community should presume to resolve ongoing work. The IPC is generally supportive of this recommendation, and discusses its support for this	Registrars, Registries, or ICANN Org)	ateral changes.	Clarify	serve the public interest.			
		The IPC is generally supportive of this recommendation, and discusses its support for this recommendation in greater detail below. The RT recommends, and the IPC supports, several methods for ICANN to better utilize its							
		relationships							
		with the Registrars and Registries to combat DNS abuse, including SSR2 Recommendation 10 "Improve							
		the Framework to Define and Measure Registrar & Registry Compliance," SSR2							
		Recommendation 15: "Enhance Contracts with Registrars and Registries to Incent the Mitigation of DNS Abuse," and							
		SSR2 Recommendation 16: "Create Pricing Incentives for Contracted Parties to Mitigate Abuse and							
		Security Security Threats. The IPC supports these recommendations and any steps to more effectively combat DNS abuse							
		Threats." The IPC supports these recommendations and any steps to more effectively combat DNS abuse relating to the Registry Agreement (RA) and Registrar Accreditation Agreement (RAA)							
		relating to the Registry Agreement (RA) and Registrar Accreditation Agreement (RAA) contracts.							
		Accordingly, the IPC supports these SSR2 recommendations that would require meaningful enforcement of existing obligations of registries and registrars to prohibit							
		certain security threats and abusive activities, enhance such requirements to further mitigate such							
		include real consequences for registrants who engage in prohibited abusive behavior, and							
I	_	motivate active	Unclear, discuss (seems IPC is agreeing with Team's	L					
IPC	15	and consistent investigation and response to reports of abuse by registrars.	recommendations so no action needed?)	None?	None?	Agreed; incorporated?			

						1-	1		
Source Re	ec Title	Comment	Preparer Comments	Actions	General Actions	Response			
	ICANN org should, make SSR requirements mandatory on contract or								
	requirements mandatory on contract or baseline agreement renewal in								
	agreements with contracted parties,								
	including Registry Agreements (base and								
	individual) and the RAA, These contract		5 11 H 16 W (PD10 11 H)						
	requirements should include provisions that establish thresholds of abuse (e.g.,	As noted with regard to SSR2 recommendation 11.2, the Board seeks clarification regarding	Evolving the definition of "DNS Abuse" is an ongoing responsibility, not an excuse for inaction. See above for						
	3% of all registrations) that would	whether this recommendation would be reasonable in terms of resource deployment in light of	the role the Board should play, along with ICANN Org, in						
	automatically trigger compliance inquiries,		serving SSP needs and the nublic interest when						
	with a higher threshold (e.g., 10% of all registrations) at which ICANN org	Further, as noted above, the Board cannot unilaterally impose new obligations on contracted parties through acceptance of a recommendation from the SSR2 RT. The Registry Agreement	negotiating Registrar and Registry agreements. While the Board cannot "ensure a particular outcome" in these	Further explanation. The heard can					
	considers renistrars and renistries to be in	and Registrar Accreditation Agreement (RAA) can be modified either via a consensus policy	neontiations it can demonstrate interest and leadership	instruct negotiators to include these					
	default of their agreements. The CCT	and Registrar Accreditation Agreement (RAA) can be modified either via a consensus policy development process or as a result of voluntary contract negotiations. In either case, the Board	in this impactful undertaking that has been ignored for too	consitions, we note PDP might be		Board responsibility and			
ICANN Board		does not have the ability to ensure a particular outcome.	long.	needed.	Further explanation	recommended action clarified.			
	ICANN org should, make SSR								
	requirements mandatory on contract or								
	baseline agreement renewal in agreements with contracted parties,								
	including Registry Agreements (base and								
	individual) and the RAA. These contract requirements should								
	include provisions that establish		Evolving the definition of "DNS Abuse" is an ongoing						
	thresholds of abuse (e.g. 3% of all	ICANN org notes it is unable to unilaterally "make SSR requirements mandatory". Neither	responsibility, not an excuse for inaction. See above for						
	registrations) that would automatically trigger compliance inquiries, with a higher	ICANN org nor the Board can unilaterally impose new obligations on contracted parties. The Registry Agreement (RA) and Registrar Accreditation Agreement (RAA) can only be modified	the role the Board should play, along with ICANN Org, in serving SSR needs and the public interest, when						
	threshold (e.g., 10% of all registrations) at	either via a consensus policy development process or as a result of voluntary contract	negotiating Registrar and Registry agreements. While the						
	which ICANN org considers registrars and	either via a consensus policy development process or as a result of voluntary contract negotiations (as noted by the Board) ICANN org therefore encourages the SSR2 RT to	negotiating Registrar and Registry agreements. While the Board cannot "ensure a particular outcome" in these	Discussions have taken place for					
	registries to be in default of their agreements. The CCT Review also	consider the ongoing community discussions regarding the definition of "DNS abuse" and how to measure "DNS abuse" through metrics and reporting in finalizing this recommendation, as	negotiations, it can demonstrate interest and leadership	years, impact is low. We recommend		Board and ICANN Org			
ICANN Org	15.1 recommended this approach.	noted by the Board.	long.	to initiate relevant PDO		responsibility and recommended action clarified.			
	In the longer term, ICANN Board should								
	request that the GNSO initiate the process								
	to adopt new policies and agreements with Contracted Parties that measurably								
	improve mitigation of DNS abuse and								
	security threats, including changes to								
	RDAP and registrant information,								
	incentives for contracted parties for abuse/security threat mitigation,								
	establishment of a performance metrics		Considering that the registrars and registries control the						
	framework, and institutionalize training		GNSO Council and PDP outcomes, one would expect such support, which raises quesstions about the efficacy			Agreed but a more balanced GNSO and PDP process is			
RrSG	and certifications for contracted parties	For recommendation 15.4, the RrSG supports the use of the GNSO to develop ICANN policy.	such support, which raises quesstions about the efficacy of ICANN's processes and the Team's recommendation.	None	None	GNSO and PDP process is needed			
1400	15.4 and key stakenoiders Create Pricing Incentives for Contracted	. or recommendation 10.4, the reconsupports the use of the GNOO to develop ICANN policy.	or to use a processes and the reality recommendation.	recent	140110	noodeu.			
	Parties to Mitigate Abuse and Security	The BC applauds this common sense recommendation and encourages ICANN Org and the							
BC	16 Threats	Board to institute incentive policies as a matter of priority.	no action needed	no action needed	no action needed	Agreed			
		(7) Make all forms of pricing, including promotional pricing and bulk registration pricing, a							
	Create Pricing Incentives for Contracted	matter of public record and "open data". We concur with the SSR2 RT recommendation that ICANN should study pricing, yet urge the review team to further ask that registries and	Agree, but would note that staff deleted what little price						
	Parties to Mitigate Abuse and Security	ICANN should study pricing, yet urge the review team to further ask that registries and registrars share pricing with ICANN as a matter of contract, and that ICANN publish pricing at	reporting requirements there were in the new aTLD base						
M3AAWG	16 Threats	its web site, in machine usable formats.	registry agreement.	Include pricing more clearly	Add text	Agreed; incorporated			
	Create Pricing Incentives for Contracted	(8) We urge the SSR2 team to call for further economic modeling and study of the DNS							
M3AAWG	Parties to Mitigate Abuse and Security 16 Threats	economy by qualified professionals instead of explicit pricing recommendations.	Discuss	third party, external review? discuss	unclear?	2			
		(3.3.11) The SSAC notes that this recommendation may be premature, as it presupposes the							
		results from the activity proposed in Recommendation 14. The SSAC has some concerns regarding the propriety and practicality of this recommendation.							
		The SSAC has some concerns regarding the propriety and practicality of this recommendation.							
		This proposal may transfer abuse behaviour into those parts of the domain name space that							
		are not directly subject to the same incentives and constraints. Such a program may be extremely difficult to manage and its effectiveness difficult to measure.							
		This recommendation also proposes a shift of ICANN's role, as ICANN has moved away from a price regulatory role and towards an environment where pricing is a function of market							
	Create Pricing Incentives for Contracted Parties to Mitigate Abuse and Security	dynamics.	Need to change "pricing" to "fees"; SSAC is conflating						
SSAC	16 Threats	o)names.	separate ideas.	Clarify	Clarify	Recommendation clarified			
			ICANN Org's record of unilaterally using fee reductions to	Clarify and advise their involvement to	0				
	Create Pricing Incentives for Contracted	While this recommendation appears to be a good start, it must be subject to a PDP to determine if incentives are a good mechanism to address security threats. As for incentives,	incentivize Registrar actions (and ICANN Org's unilateral changes in Rgy fees) indicates that the RrSG is incorrect.	improve implementation. We					
	Parties to Mitigate Abuse and Security	they are usually subject to abuse itself and or gaming (and bad actors will figure out a way	RrSG and RvSG should provide input on the incentive	is an issue: while if will hannen					
RrSG	16 Threats	around it).	RrSG and RySG should provide input on the incentive process to help prevent gaiming.	process should increase "water level"	. clarify	Clarified			
		ICANN org notes that neither it nor the Board can unilaterally impose new obligations on contracted parties. The RA and RAA can only be modified either via a consensus policy							
		contracted parties. The RA and RAA can only be modified either via a consensus policy							
		development process or as a result of voluntary contract negotiations (as noted by the Board).							
	Create Pricing Incentives for Contracted	Further, ICANN org encourages the SSR2 RT to consider and describe what the likely							
	Parties to Mitigate Abuse and Security	externalities of incentivizing certain behavior might be so that the ICANN org and Board may	Wow. Staff should know this. See above. Provide	This incorrect: note that PIR has one		Disagree. Additional information			
ICANN Org	16 Threats	comprehensively assess the impacts of the implementation of this recommendation.	citations.	and is effective.	Add citation	provided.			
	Create Pricing Incentives for Contracted Parties to Mitigate Abuse and Security		See review team's bylaw mandate, which places this						
RySG	16 Threats	Again, the RySG opposes this recommendation because it's outside the scope of the RT's role.	SSR-driven recommendation in scope.	none	none	Disagree; see Bylaws mandate			
		The IPC is generally supportive of this recommendation, and discusses its support for this							
		recommendation in greater detail below. The RT recommends, and the IPC supports, several methods for ICANN to better utilize its							
		relationships							
		with the Registrars and Registries to combat DNS abuse, including SSR2 Recommendation 10:							
		"Improve							
		the Framework to Define and Measure Registrar & Registry Compliance," SSR2 Recommendation 15:							
		"Enhance Contracts with Registrars and Registries to Incent the Mitigation of DNS Abuse," and							
		SSR2 Recommendation 16: "Create Pricing Incentives for Contracted Parties to Mitigate Abuse and							
		Security Recommendation 16: "Create Pricing Incentives for Contracted Parties to Mitigate Abuse and Security							
		Threats." The IPC supports these recommendations and any steps to more effectively combat							
		DNS abuse							
		relating to the Registry Agreement (RA) and Registrar Accreditation Agreement (RAA) contracts.							
		Accordingly, the IPC supports these SSR2 recommendations that would require meaningful enforcement of existing obligations of registries and registrars to prohibit							
		certain							
		security threats and abusive activities, enhance such requirements to further mitigate such							
		activities, include real consequences for registrants who engage in prohibited abusive behavior, and							
		motivate active				l			
IPC		and consistent investigation and response to reports of abuse by registrars.	none	none	none	Agreed			
ICANN Org	SSR2 Recommendation 16.1: 16.1 "commercial providers"	Requests for clarification of terms	Add footnote defining commercial providers	add footnote	add footnote	Footnote added			
	Contracted parties with portfolios with less	As noted in the section "Requests for Clarification of Terms." ICANN seeks clarification	delining delinine due providers		222 10001010				
	than a specific percentage (e.g., 1%) of	regarding the term "commercial providers". ICANN org also notes that this recommendation							
			Review team is aware of the Board and ICANN Org's			The activity noted was taken into			
	receive a fee reduction (e.g., a reduction	Choice Review Team (CCT RT) recommendations. The Board passed through CCT recommendation 12 regarding incentives to the New gTLD Subsequent Procedures PDP	actions and inactions) on CCT Review recommendations,		Add footnote on PIR's	account by the Review Team. This recommendation should be			
	from current fees, or an increase of the	recommendation 12 regarding incentives to the New gTLD Subsequent Procedures PDP Working Group (see page 2 of the scorecard). ICANN org encourages the SSR2 RT to consider the ongoing work of the New gTLD Subsequent Procedures PDP Working Group with regard to applicant fees and whether this recommendation may overlap with that work.	as well as the New gTLD Subsequent Procedures PDP		success with this	adopted and implemented to			
ICANN Org	current per domain name transaction fee 16.1 and provide a Registrar with a discount).	consider the ongoing work of the New gTLD Subsequent Procedures PDP Working Group with regard to applicant fees and whether this recommendation may overlap with that work.	working group's activities and their limited utility for improving SSR and mitigating abuse	none	approach with registrars it does business with.	improve SSR and help mitigate abuse.			
						1			

Source Rec	Title Given all parties (ICANN org, contracted	Comment	Preparer Comments	Actions	General Actions	Response			
	narties, and other critical stakeholders								
	such as Registries, Registrars, Privacy/Proxy Service Providers, Internet								
	Service Providers, and the contracted								
	parties) must understand how to accurately measure track detect and								
	accurately measure, track, detect, and identify DNS abuse, ICANN org should								
	institutionalize training and certifications all parties in areas identified by DAAR and								
	other sources on the common methods of abuse [citation to be added] and how to								
	establish appropriate mitigation efforts.								
	Training should include as a starting point: Automatic tracking of complaint numbers		This is clearly within SSR2's Bylaw mandate. Perhaps						
	and treatment of complaints:		the several million ICANN is receiving from Verisign could help cover the cost without canceling antying?			Disagree. It is within SSR2's mandate and funding decisions			
RrSG	Quarterly/Yearly public reports on 16.2 complaints and actions; and analysis.	Recommendation 16.2 is outside of ICANN's remit, and the source of funding for this is not clear (e.g. what would ICANN cancel to pay for this).	Funding decisions rest with the Board.	None	None	rest with the Board.			
	Given all parties (ICANN org. contracted	ICANN notes that both in Recommendation 15.4 and 16.2, the SSR2 RT recommends that							
	parties, and other critical stakeholders such as Registries, Registrars.	ICANN notes that both in Recommendation 15.4 and 16.2, the SSR2 RT recommends that ICANN org "institutionalize training and certifications." ICANN org requests clarification regarding the SSR2 RT's expectations for training and certifications (i.e., types, methods) as							
	such as Registries, Registrars, Privacy/Proxy Service Providers, Internet Service Providers, and the contracted	regarding the SSR2 RT's expectations for training and certifications (i.e., types, methods) as							
	parties) must understand how to	well as the intended meaning of 'institutionalize' is the SSR2 RT requesting that general training ocurses be offered, for example through ICANN Learn, regarding SSR2-related topics such as abuse? . Is the intent of the SSR2 RT's recommending that a more							
	accurately measure, track, detect, and identify DNS abuse, ICANN org should	regarding SSR-related topics such as abuse? Is the intent of the SSR2 RT's recommendation to go beyond such activities? Is the SSR2 RT recommending that a more							
	institutionalize training and certifications all	formal certification program be created, where, upon completion, parties are "ICANN-certified" in SSR-related issue miligation? It is not clear who the intended audience of the training and certification is as the SSR2 RT							
	other sources on the common methods of	It is not clear who the intended audience of the training and certification is as the SSR2 RT							
	Training should include as a starting point:	Depending on the SSR2 RT's expectations, ICANN org has concerns with the feasibility of implementing such global certification programs. Finally, if the SSR2 RT is referring to more							
	Automatic tracking of complaint numbers and treatment of complaints:	stringent requirements to complete training or certification, such as potential obligations in contracts, this is not within ICANN org's remit to unilaterally impose, as such changes could							
ICANN Ora	and treatment of complaints; Quarterly/Yearly public reports on 16.2 complaints and actions; and analysis.	contracts, this is not within ICANN org s remit to unilaterally impose, as such changes could only come about via consensus policy development or voluntary contract negotiations (as noted by the Board).	Clarify relevant parties, registries and registrars, plus ICANN.	Clarify	Clarify	Clarified			
ICANN Org BC	16.2 complaints and actions; and analysis. 17 Establish a Central Abuse Report Portal		ok	None	Clarity	Clarified			
						. g			
		It is not clear what are the "relevant parties" in this recommendation. If only registrars and registries, then such a system will likely cost more than any perceived benefit. If it is intended that it must be all including (or PID providers benefit any perceived benefit of	Clarify relevant parties, registries and registers—————						
RrSG		that it would be all inclusive (e.g. P/P providers, hosting providers, etc), it would be outside of ICANN's scope.	Clarify relevant parties, registries and registrars, plus ICANN.	Clarify	Clarify	Clarified			
WIRO	47 F-1-15-1 - O1-1 - O - 15 - 1	In addition to a Central Abuse Report Portal, any measures that ICANN or a Contracted Party	A	4440	4440	A			
WIPO		implements to address a reported abuse should be published along with the responses. The Registry Agreement requires an email abuse point of contact (POC) on a per-registry	A categorical reponse might be appropriate	Add?	Add?	Agreed; added??			
		has the registry registry regular memory and the result of a PDP or contract amendment. The RySG further reiterates its concern with the use of the "abuse" terminology in this	There could be a delay to making data available. Data						
		The RySG further reiterates its concern with the use of the "abuse terminology in this recommendation. The RySG is also unsure why the responses must be publicly searchable, especially considering that they may contain confidential, sensitive or personal information, and	should be anonymized and presented in categories.						
		especially considering that they may contain confidential, sensitive or personal information, and	Abuse emails should not disappear. System						
RySG	17 Establish a Central Abuse Report Portal	that the disclosure of such information could disrupt in-process law enforcement investigations or violate the privacy rights of data subjects.	prefer.	Clarify	Clarify	Clarified			
		The IPC is supportive of this recommendation, and discusses its support for this recommendation in greater detail below.							
		The IPC strongly supports the RT's recommendations that address investigating and							
		responding to DNS abuse, including Recommendation 12: "Create Legal and Appropriate Access Mechanisms to							
		WHOIS							
		Data," SSR2 Recommendation 13: "Improve the Completeness and Utility of the Domain Abuse Activity							
		Reporting Program (DAAR)," SSR2 Recommendation 17: "Establish a Central Abuse Report Portal " and							
		Portal," and SSR2 Recommendation 19: "Update Handling of Abusive Naming." Recommendation 12							
		addressing WHOIS data addresses issues raised by many in the community including the Security and							
		Stability Advisory Committee (SSAC), Governmental Advisory Committee (GAC), BC, and IPC. It is							
		important to the							
		issue of addressing abuse that registrant data is correct, and available through the proper channels or to							
IPC	17 ICANN org should establish and maintain	the proper authorities.	ok	None	None	Agreed			
	a central DNS abuse complaint portal that								
	automatically directs all abuse reports to relevant parties. The system would purely								
	act as inflow, with only summary and metadata flowing upstream. Use of the								
	metadata flowing upstream. Use of the system should be mandatory for all								
	aTLDs: ccTLDs should be invited to join.								
	Responses must be publicly searchable and included in yearly reports (in complete								
	form, or by reference). In addition, reports	(3.3.12) The SSAC suggests that this recommendation be given a clearer rationale and also should note that any implementation of such a measure should carefully mitigate the inherent	Rationale: ease of use, tracking of enforcement action,						
SSAC	17.1 to non-participating ccTLDs.	is nouid note that any implementation of such a measure should carefully mitigate the innerent risks of undertaking this role of intermediary in abuse reporting.	identification of problem parties.	Clarify	Clarify	Clarfied			
ICANN Ora	SSR2 Recommendation 17 1: "abuse	Requests for clarification of terms							
IONINI UIG	ICANN org should establish and maintain	requests for clarification of terms							
	a central DNS abuse complaint portal that automatically directs all abuse reports to								
	act as inflow, with only summary and metadata flowing upstream. Use of the								
		ICANN org notes that there are no details or rationale for this recommendation in the "ICANN	Abuse reports are not working right now, emails often fail						
	gTLDs; ccTLDs should be invited to join. Responses must be publicly searchable	Compliance" section of the SSR2 draft report. It is difficult for ICANN org to determine how the review team envisions the operational details and measures of success for this recommendation. For this reason, ICANN org encourages the SSR2 RT to clarify the identified	to create impact. Portal increases ease of use and simplifies ensuring that reports are correctly formatted						
	and included in yearly reports (in complete	recommendation. For this reason, ICANN org encourages the SSR2 RT to clarify the identified issues or risks that led to this draft recommendation, how the recommended solution will	and complete to allow for action. This will cut down on time being wasted on reports that are incomplete or go to						
	should be made available (e.g., via email)	address these issues or risks, the expected impact of implementation, or what relevant metrics	the wrong party. Overall, this will provide better security						
ICANN Org	17.1 to non-participating ccTLDs.	could be applied to assess implementation. The BC concurs with this recommendation.	and anti-abuse action, without costing CP more money.	Clarify	Clarify	Clarified			
		For too long ICANN's compliance function has been notoriously weak The RC supports the							
		Board's investiture of additional power into Compliance, and further supports greater accountability by Compliance through the adherence to SLAs. If ICANN is to do its part in							
	Ensure that the ICANN Compliance	mitigating DNS abuse, it must have an effective, accountable compliance function; further, to							
BC	18 Activities are Neutral and Effective		ок	none	none	Agreed			
0040	Ensure that the ICANN Compliance	(3.3.13) The SSAC is unsure of how this recommendation materially differs from	D	D	D :	Recommendations merged,			
SSAC	18 Activities are Neutral and Effective	Recommendations 10 and 15. To support the recommendation of ICANN increasing its Compliance efforts, serious	Recommendations merged	Recs merged	Recs merged	clarified			
		considerationshould be given to addressing – to use ICANN's word – the "discrepancy" identified in ICANN's letter of February 12, 2020 to the Business Constituency that ICANN's							
		identified in ICANN's letter of February 12, 2020 to the Business Constituency that ICANN's compliance obligations are limited to ensuring that a registrar includes an abuse policy clause in its registration agreement. Such self-imposed limitation can hardly be said to underpin a							
	Ensure that the ICANN Compliance	in its registration agreement. Such self-imposed limitation can hardly be said to underpin a compliance program that is stated to support the security and stability of the global Internet,							
WIPO	Ensure that the ICANN Compliance 18 Activities are Neutral and Effective	upon which business and consumers rely.	Fair point	Address	Address	Agreed; clarified			
		The RySG is unclear why this recommendation is being made. Although SSR2 flags that the contractual obligations are implemented differently by each							
		Although SSR2 flags that the contractual obligations are implemented differently by each contracted party, the RySG notes that the contracts do not prescribe uniform or required							
		mechanisms for contracted parties to meet their obligations. There is presently no SLA that can be pointed to in order to determine, unequivocally, that a contracted party is "aiding and							
	Ensure that the ICANN Compliance	abetting systemic abuse," nor does it make sense to try to measure contracted party behavior in this way.							
RySG	18 Activities are Neutral and Effective	This recommendation should be reconsidered.	Add additional explanation	Clarify	Clarify	Clarified			

Source Rec	Title	Comment	Preparer Comments	Actions	General Actions	Response			
IPC		The IPC is supportive of this recommendation.	ОК	none	none	Agreed			
	ICANN org should have compliance activities audited externally and hold them	Regarding recommendation 18.1, the RrSG supports that ICANN Compliance should be							
RrSG	18.1 to a high standard	subject to outside audit	ок	none	none	Agreed			
	-	ICANN org encourages the SSR2 RT to clarify the identified issues or risks, how the recommended solution will address them, the expected impact of implementation, and what							
		recommended solution will address them, the expected impact of implementation, and what relevant metrics could be applied to assess implementation. Particularly, ICANN org seeks							
		clarification on the following:							
		clarification on the following: Who does the SSR2 RT envision conducting the external audit?							
		What would the criteria be for an external audit and how would the criteria be applied? What is a "bigb" standard? Who determines that and how is it measured?							
		What is a "high" standard? Who determines that and how is it measured? Further, ICANN org notes that the RDS-WHOIS2 Review Team reviewed ICANN Contractual							
	ICANN org should have compliance								
	activities audited externally and hold them	recommendations. The Board took action on the RDS-WHOIS2 recommendations in February 2020 (see RDS-WHOIS2 Recommendations, CC.3 - approved, R4.1 and R4.2 - placed in	Many of these issues should be addressed by ICANN						
ICANN Org	18.1 to a high standard.	pending status).	Org in a proposed implementation plan	Clarify	Clarify	Clarified			
	The ICANN Board should empower the								
	Compliance Office to react to complaints and require Compliance to initiate								
	investigations and enforce contractual								
	obligations against those aiding and abetting systemic abuse, as defined by the								
	SLA. This additional authority could								
	include support for step by step actions around the escalation of enforcement								
	measures and appropriate implementable actions that ICANN org can use in								
	actions that ICANN org can use in								
	response to any failures to remedy compliance violations within specified	(2) Empower ICANN Compliance with contracts and enforcement tools to mitigate domain							
M3AAWG	18.2 timeframes.	abuse.	OK	none	none	Agreed			
	The ICANN Board should empower the								
	Compliance Office to react to complaints								
	and require Compliance to initiate investigations and enforce contractual								
	abetting systemic abuse, as defined by the SLA. This additional authority could								
	include support for step by step actions								
	around the escalation of enforcement measures and appropriate implementable								
	actions that ICANN org can use in								
	response to any failures to remedy compliance violations within specified	For recommendation 18.2, the RrSG notes that these obligations exist in the RAA and	They misunderstand the recommendation if they think it	Is clarification needed? Or is their					
RrSG	18.2 timeframes.	Compliance already monitors it.	is already being done.	statement disingenuous?	?	?			
	SSR2 Recommendation 18.2: "as defined								
ICANN Org		Requests for clarification of terms							
	The ICANN Board should empower the Compliance Office to react to complaints								
	and require Compliance to initiate								
	obligations against those aiding and abetting systemic abuse, as defined by the SLA. This additional authority could								
	SLA. This additional authority could								
	include support for step by step actions around the escalation of enforcement	ICANN org notes the ICANN Contractual Compliance team does react to complaints and							
	actions that ICANN org can use in response to any failures to remedy	what the SSR2 RT means by "systemic abuse," and the definition used by the SSR2 RT, as							
	compliance violations within specified	what the SRZ RT means by "systemic abuse," and the definition used by the SSRZ RT, as well as the meaning of 'aiding and abetting' in the context of the recommendation provided by the SSRZ RT. SRZ RT is set used as the meaning of 'aiding and abetting' in the context of the recommendation provided by the SSRZ RT is SRZ RT is SRZ RT is set used to the SRZ RT is SRZ RT is set used to the SRZ RT is set used t							
ICANN Org	18.2 timeframes.	referring to, and why the SSR2 RT feels that this SLA is appropriate in this context.	Clarify	clarify	clarify	Clarified			
	The ICANN Compliance Office should, as their default, involve SLAs on enforcement								
	and reporting, clear and efficient								
	processes, a fully informed complainant,	For recommendation 18.3, ICANN Compliance already does this (see https://features.icann.							
RrSG	measurable satisfaction, and maximum 18.3 public disclosure.	org/compliance/dashboard/report-list).	Clarify	clarify	clarify	Clarfied			
		ICANN Contractual Compliance strives to have clear and efficient processes and keep those who make complaints informed and satisfied. If SSR2 RT has data indicating Compliance has							
		who make complaints informed and satisfied. If SSR2 RT has data indicating Compliance has not met those goals, ICANN org encourages the SSR2 RT to present the data and develop							
	The ICANN Compliance Office should, as	not met those goals, ican't oig encourages the SSAZ AT to present the data and develop recommendations that clearly identify ways in which it believes Compliance can better perform their functions to address the deficiencies documented in that data. It is unclear what SLAs	ICANN Org should review the decade of input from						
	their default, involve SLAs on enforcement	their functions to address the deficiencies documented in that data. It is unclear what SLAs	ICANN Org should review the decade of input from groups representing complainents, such as the BC and IPC, which does not support a claim that ICANN						
	and reporting, clear and efficient processes, a fully informed complainant	SSR2 RT is referring to and with whom those service level agreements would be made. With regards to "maximum public disclosure," ICANN org suggests it would be helpful for the SSR2 RT to document what information should be disclosed, particularly in light of GDPR-related	IPC, which does not support a claim that ICANN Compliance has "clear and efficient processes and keep."						
	processes, a fully informed complainant, measurable satisfaction, and maximum	RT to document what information should be disclosed, particularly in light of GDPR-related	Compliance has "clear and efficient processes and keep those who make complaints informed and satisfied."						
ICANN Org	18.3 public disclosure.	privacy requirements, to whom, and by what means?	Clarify SLA	clarify SLA	clarify SLA	Clarified			
		The BC concurs with this recommendation. ICANN Org should acknowledge and track the rise of misleading naming and trademark infringement as a growing trend in abusive naming. It has							
		long been recognized that most trademark infringement targets users of famous brands and							
		long been recognized that most trademark infringement targets users of famous brands and defrauds the individual user, not the large global brand. Abusers recognize the ease with which they can utilize the goodwill of a brand to lead the user to trust the infringer and provide							
BC	19 Update Handling of Abusive Naming	personal information or funds to the abuser.	ok	none	none	Agreed			
		(3.3.14) The rationale that reducing the potential for name similarity contributes to improved							
		security of the DNS can be countered by the desire to express names meaningful to humans in the DNS in the languages, scripts and glyphs that humans use. There is a tension here							
		the DNs in the languages, scripts and glyphs that numans use. There is a tension here between utility and security that the report does not cover in sufficient depth. SSAC notes that Recommendations 19's consideration to 'update handling of abusive naming' may be an							
		Recommendations 19's consideration to 'update handling of abusive naming' may be an							
		inappropriate designation of responsibility.							
		These recommendations would benefit from an assessment of what falls under ICANN org's remit to enforce, and what efforts ICANN org may be able to facilitate to support a broader	The recommendation does not recommend deleting						
SSAC	19 Update Handling of Abusive Naming	remit to enforce, and what efforts ICANN org may be able to facilitate to support a broader community of interest.	names, we should clarify that we are calling for more oversight and checks, not "censorship".	Clarify	clarify	Clarified			
	aparation of the state of t	Using so-called homograph spoofing, cybersquatters sometimes take advantage of visual		9	,				
		Using so-called homograph spoofing, cybersquatters sometimes take advantage of visual similarity between character sets. ICANN may wish to explore technical (if not contractual)	This is something we should consider. Might have to						
WIPO	19 Update Handling of Abusive Naming	means to enforce the prohibition on the registration of mixed-script domain names combining ASCII with non-ASCII characters which do not minimize user confusion.	have carve outs for places that use both (e.g. a firm might on purpose use latin + cyrillic for all their stuff)	?	?	?			
		The RySG believes that this recommendation is outside the scope of SSR2 and does not							
RySG	19 Update Handling of Abusive Naming	support it.	Might be correct, should consider how to tackle that.						
		The IPC is supportive of this recommendation, and discusses its support for this							
		The IPC strongly supports the RT's recommendations that address investigating and							
		responding to DNS							
		abuse, including Recommendation 12: "Create Legal and Appropriate Access Mechanisms to WHOIS							
		Data," SSR2 Recommendation 13: "Improve the Completeness and Utility of the Domain							
		Abuse Activity Reporting Program (DAAR)," SSR2 Recommendation 17: "Establish a Central Abuse Report							
		Portal " and							
		SSR2 Recommendation 19: "Update Handling of Abusive Naming."							
		 The IPC also strongly supports							
		The IPC also strongly supports and commends the RT's Recommendation 19 to target abusive naming in the DNS.							
		Cybercriminals are assisted in their attacks on individuals and companies through use of misleading names,							
		offentimes							
		channeling a trusted or well-known name (including in many cases a trademark), to gain the							
		trust of their victims. The IPC encourages ICANN to adopt this recommendation and take steps to make it							
IPC		more	at.						
IPC	19	difficult for a cybercriminal to take advantage of abusively misleading names.	ok	none	nune	Agreed			

Source	Rec	Title	Comment	Preparer Comments	Actions	General Actions	Response		
			Recommendation 19.1 is something that is already shared among commercial and community- driven threat exchanges and are used by many companies for their endpoint protection. It is no						
		ICANN org should build upon the current	driven threat exchanges and are used by many companies for their endpoint protection. It is no						
		activities to investigate typical misleading naming, in cooperation with researchers	for ICANN to aggregate and provide these services for free (as some of them are available for purchase)						
RrSG	19.1	and stakeholders, wherever applicable	purchase)	Just because someone makes money off it?	Clarify ICANN role?	Clarify?	Clarified?		
		SSR2 Recommendation 19 1: "misleading		Names that could mislead reasonable person potentially		,			
ICANN Org	19.1	naming"	Requests for clarification of terms	by accident. SAS example.	Clarify	Clarify	Clarified		
		When misleading naming rises to the level				·			
		of abusive naming, ICANN org should							
		include this type of abuse in their DAAR							
RrSG	10.2	reporting and develop policies and mitigation best practices.	Recommendation 19.2 is not clear. If a misleading domain names become abusive, then it will be listed in the feeds DAAR uses automatically.	Yes, but not as separate category.	Clarify	Clarify	Clarified		
NIGO	10.2	SSR2 Recommendation 19.2: "misleading	be listed in the reeds DAAR dises automatically.	res, but not as separate category.	Ciarry	Ciality	Ciarilled		
ICANN Org	19.2	naming" and "abusive naming"	Requests for clarification of terms	see above, latter is to mislead on purpose.	Clarify	Clarify	Clarified		
			Without clear definitions of "misleading" and/or "abusive", it is difficult to identify bestpractices						
			for mitigation and establish criteria that distinguishes between the two ICANN org notes						
			ongoing discussions related to the definition of "DNS abuse". However, we are unaware of any consensus within the community on the definition of "misleading". Beyond this, ICANN org						
			reputation feed that meets the documented OCTO curation criteria1. ICANN org encourages						
			the SSR2 RT to suggest such a feed for what it considers "misleading" and "abusive" naming to						
		When minleading naming rises to the level	be. Further, ICANN org cannot unilaterally develop policy. ICANN org suggests that the SSR2 RT						
		of abusive naming, ICANN org should	consider directing this element of the recommendation to the Generic Names Supporting						
		include this type of abuse in their DAAR	Organization (GNSO) Council for review as to whether the recommendation should be						
ICANINI O	40.0	reporting and develop policies and	considered in a consensus policy development process. See also the ICANN Board comment	misleading is a word used in normal language, it is pretty	Clarify	Clarify	Clarified		
ICANN Org	19.2	mitigation best practices.	pertaining to draft recommendations outside of the Board's oversight responsibilities.	clear.	Clarity	Clarity	Clarified		
			The IPC understand the DAAR to be a collection of existing, publicly available feeds. The IPC suggests that this recommendation might better be expressed as "ICANN Org should seek to						
			identify and incorporate feed(s) tracking this type of abuse in the DAAR. We would also						
			encourage ICANN org to include information covering cybersquatting within the meaning of						
IDC	19.2		"abusive naming" for purposes of reporting and other requirements around anti-abuse measures, to the extent this category is not already explicitly covered.	Discussion required	2	2	2		
0	19.2	ICANN org should publish the number of	mouseures, to the extent tills category is not already explicitly covered.	Discussion requires					
		abusive naming complaints made at the							
		abusive naming complaints made at the portal in a form that allows independent	L						
		third parties to analyze, mitigate, and	For recommendation 19.3, such data needs to be curated and require a Traffic Light Protocol						
RrSG	10.2	prevent harm from the use of such domain names.	for sharing such information. Furthermore, this requires a clear definition of what is misleading and what can lead to abuse.	Add this in? Makes some sense.	?	2	2		
1436	19.3	ICANN org should update the current	and what can load to addise.	AND THE MENTS SUITE SCHOOL					
		"Guidelines for the Implementation of							
		IDNs" (citation to be added) to include a					Disagree; a PDP was not		
		section on names containing trademarks, TLD-chaining, and the use of (hard-to-					required to create, implement and update the Guidelines so it		
		ILD-chaining, and the use of (nard-to-		A PDP was not required to create, implement and update the Guidelines so it stands to reason that this			stands to reason that this		
		spot) typos. Furthermore, ICANN should contractually enforce "Guidelines for the	Recommendation 19.4 should originate from a PDP rather than a review team. Additionally, it is	recommendation wouldn't require a PDP to apply to			recommendation wouldn't require		
		Implementation of IDNs" for gTLDS and	not the place of a review team to initiate RAA or RA negotiation or	contracted parties either https://community.icann.			a PDP to apply to contracted		
RrSG	19.4	recommend that ccTLDs do the same.	changes.	org/display/IDN/IDN+Implementation+Guidelines	none	none	parties		
			The ICANN IDN Guidelines should not duplicate, potentially putting itself in conflict with the Registry Agreement or ICANN policies, what otherwise can be applied in a more general way						
			to all types of domain names. ASCII and IDN						
		ICANN org should update the current	to all types of domain names, ASCII and IDN. For example, Specification 7 (Rights Protection Mechanisms) of the 2017 Base Registry						
		"Guidelines for the Implementation of	Agreement applies equally to all domain name registration regardless of the script used						
		IDNs" [citation to be added] to include a	Further, there seems to be the incorrect percention that ICANN does not enforce the IDN						
		section on names containing trademarks,	Implementation Guidelines upon gTLD registries, when the opposite is true. ICANN uses the						
		TLD-chaining, and the use of (hard-to- spot) typos. Furthermore, ICANN should	Implementation Guidelines upon gTLD registries, when the opposite is true. ICANN uses the Registry System Testing process to evaluate registry operator's implementation of the IETF Standards and IDN Guidelines (i.e. Specification 6 of the 2017 Base Registry Agreement), prior						
		contractually enforce "Guidelines for the	to delegation and when required by a new Registry Service Evaluation Process. If the registry operator does not meet the requirement as set forth in their registry agreement, then the						
		Implementation of IDNs" for gTLDS and	operator does not meet the requirement as set forth in their registry agreement, then the						
RySG	19.4	recommend that ccTLDs do the same.		We need to collect evindence on this.	?	?	?		
			The IPC encourages the RT to expand on this recommendation, which presently lacks clarity and specificity. The recommendation might include specific reference to cybersquatting and the						
IPC	19.4		use of IDN homoglyphs to mimic trademarks as an example of abusive naming through IDNs.	Correct incorporate	2	2	2		
			The Roard's draft proposal for resourcing and prioritization of community recommendations						
			The Board's draft proposal for resourcing and prioritization of community recommendations developed with input from leadership of all specific review teams, notes that an effective						
			ICANN as a whole. Clear articulation of the observed issue gives insight into the intent of the recommendation and the justification for why it should be adopted. With this in mind, the Board						
			notes that a number of the SSR2 RT's recommendations, as currently drafted, do not clearly						
			notes that a number of the SSR2 RT's recommendations, as currently drafted, do not clearly define the identified issues or risks, the rationale for the recommended solutions, the expected						
	105071								
ICANN Board	1, 2, 5, 6, 7, 8, 9, 10.1 and 29.		impact or implementation, or what relevant metrics could be applied to assess implementation. Some examples as outlined in this comment include SSR2 RT recommendations 1, 2, 5, 6, 7, 8, 9, 10.1 and 29.	Clarify	Clarify	Clarify	Clarified		
Doard	_, ro. r anu 29.				y	_ amy			
			ICANN org reiterates the Board's comment that it is helpful for the ICANN org, Board, and community to have an understanding of the particular issues or risks that each recommendation intends to address. A number of SSR2 recommendations, as currently						
			recommendation intends to address. A number of SSR2 recommendations, as currently						
			drafted, do not clearly define the identified issues or risks, how the recommended solution will address the issues or risks, the expected impact of implementation, or what relevant metrics could be applied to assess implementation (for example, SSR2 recommendations 1, 2, 5, 6, 7,						
	1, 2, 5, 6, 7, 8, 9, 15.3.4,		address the issues or risks, the expected impact of implementation, or what relevant metrics could be applied to assess implementation (for example, SSP2 recommendations 1, 2, 5, 6, 7).						
	9, 15.3.4, 15.3.5, 18, 19.1,		8, 9, 15.3.4, 15.3.5, 18, 19.1, 19.2, 23.1, 26.2, and 29.2). ICANN org encourages the SSR2 RT						
	19.2, 23.1, 26.2,		to clarify these elements of each recommendation for the Board to properly consider the	L	L				
ICANN Org	and 29.2		recommendations and make appropriate instructions to the ICANN org and/or community.		-		Clarified		
				It is the Board's responsibility to adopt or reject a review					
				team's recommendations The review team's recommendations are submitted to the Board and if a					
				recommendation requires an SO, AC or ICANN Org					
				action, it is the Board's responsibility to refer that					
				recommendation to the appropriate party for action, track it, and ensure appropriate resolution. There is ample					
				history of the Board's responsibility and action on review					
				recommendations (https://www.icann					
				org/resources/reviews/specific-reviews) where the Board accepted recommendations, directed the CEO to					
			The Board notes that a number of the SSR2 RT's recommendations currently directed to the	accepted recommendations, directed the CEO to proceed with their implementation, and for					
			Board are outside of the Board's oversight responsibilities. For example, the Board cannot	recommendations involving an ICANN group, the Board					
			unilaterally impose new obligations on contracted parties through acceptance of a recommendation from the SSR2 RT. The Registry Agreement and Registrar Accreditation	requested that group's action and coordinated activities					
			recommendation from the SSR2 RT. The Registry Agreement and Registrar Accreditation Agreement (RAA) can only be modified either via a consensus policy development process or	between the Board and that group to oversee implementation. Further, in the past where review					
			as a result of voluntary contract negotiations. In either case, the Board does not have the ability	recommendations involved a policy development effort.					
			to ensure a particular outcome. The Board suggests that the SSR2 RT consider directing these	the Board directed preparation of an Issue Report as part					
			recommendations either to ICANN are for inclusion in a future round of voluntary contract	of a Roard-initiated GNSO policy development process					
			negotiations and/or to the GNSO Council for review as to whether the recommendation should be considered in a consensus policy development process. Some examples of	The review team disagrees with the new approach the					
			recommendations to which these observations apply include SSR2 RT recommendations 11.1	removal of the US Department of Commerce's oversight					
	1.1, 12, 15,		recommendations to which these observations apply include SSR2 RT recommendations 11.1, 12, 15, 18.2, 19, and 29. Further, the Board suggests that the SSR2 RT consider directing SSR2 RT recommendation 22.1 to the Root Server System Governance Working Group which	and urges the Board to once again embrace its					
	18.2, 19, and		SSR2 RT recommendation 22.1 to the Root Server System Governance Working Group which	accountability and review commitments, and reassert its					
ICANN Board	29, and 22.1		has recently been formed.	leadership responsibility on these critical reviews.	add explanation	add explanation	Disagree; added clarifying text		
			Finally, and critically, the RySG does not support the conclusions SSR2 has reached on the						
			next steps, in particular, recommendations for unilateral contract amendments, or pre- determined outcomes of studies or policy work as we believe both are outside the scope of						
			determined outcomes of studies or policy work, as we believe both are outside the scope of SSR2's work. Reviews, while an important part of ICANN's accountability mechanisms, cannot						
			he used to circumvent the policy development process, such as by attempting to impose new				Disagree; the team has made		
			contractual obligations on contracted parties. The RySG would also ask SSR2 to refrain from making recommendations which refer to, or overlap with, existing recommendations from other				recommendations in line with its Bylaw mandate and has done		
	10, 11, 12, 13,		reviews such as RDS-WHOIS 2, CCT-RT, Registration Data EPDP Phase 2, NCAP and potential recommendations from ATRT3.	They have mis-stated the facts and intentions of the			our best to further clarify		
RySG	14, 15, 16		potential recommendations from ATRT3.	team's recommendations	clarify	clarify	recommidations		

Source	Rec	Title	Comment	Preparer Comments	Actions	General Actions	Response			
			However, the recommendations overreach this remit, in terms of ICANN's governance and functioning mechanisms, as they advocate in a number of recommendations for unilateral, top-							
			down action from the Board or ICANN Org on new and/or under-development policy matters.							
			Specifically, recommendation 10 (Improve the Framework to Define and Measure Registrar & Registry Compliance) which is rated with a High Importance, and has among its sub-							
			recommendations unilaterally amending contract clauses (10.3) and closing the EPDP while							
			unilaterally implementing a new WHOIS policy (10.4). Further, recommendation 12 outright describes the direct and sole role that the Board should play in the creation of legal and							
			appropriate access mechanisms to WHOIS data. Even more, recommendations 15 and 16 argue for "enhancing" and "changing" contracts, respectively. All three recommendations, 12,							
			argue for "ennancing" and "changing" contracts, respectively. All three recommendations, 12, 15 and 16 are rated High Importance.							
							D:			
			We ask that the draft report be revised to take these concerns into consideration. We believe that the topics of resilience, security, and stability are crucial, and they should be taken				Disagree; the team has made recommendations in line with its			
			that the topics of resilience, security, and stability are crucial, and they should be taken seriously by those in charge of reviewing them for the ICANN ecosystem. Arguing for unilateral				Bylaw mandate and has done			
i2Coalition	10, 12, 15, 16		changes to contracts and getting ahead of the Policy Development Processes are not and cannot be normal recommendations to come out of such a review.	They have mis-stated the facts and intentions of the team's recommendations	clarify	clarify	our best to further clarify recommndations			
			FIRST therefore welcomes the SSR2 recommendations 10, 11 and 13 and looks forward to			· ·				
FIRST	10,11,13		seeing an implementation of these recommendations.	ok	none	none	Agreed			
			the RySG encourages the SSR2-RT to spend some additional time considering what it hopes to achieve by reiterating CCT-RT recommendations, and reconsider whether they are truly							
			implementation and completion of outstanding SSR1 recommendations as the key priority. In particular, the RySG believes that the remit of SSR needs to be clearly defined so that it can				SSR2 has fully considered each			
RvSG			properly inform the scope of SSR2's work and can provide the Board with some guidance on	We hope to underscore their importance and encourage	none		recommendation and stands by			
RySG	10.1, 11.2, 15.1,		The GAC invites the Review Team to consider the articulation between various	Board adoption as they support SSR objectives	none	none	its utility in improving SSR			
			Recommendations and to clarify how, for example, Recommendations 10.3, 15.1, 15.2, 15.4 and 16, which all propose changes to the contractual framework between ICANN and its							
GAC	10.3, 15.1, 15.2, 15.4, 16		and 16, which all propose changes to the contractual framework between ICANN and its Contracted Parties, should work together and be taken forward.	Agreed	clarify; merge	clarify; merge	Agreed; clarified and merged recommendations			
	.3.4, 10		The GAC welcomes proposals for specific mechanisms as set out in Recommendations 10.3	g	j, merge	y, marge				
			15.1, 15.2 and 16 to incentivize a comprehensive and effective response to DNS Abuse. The GAC has historically taken a strong interest in Registry and Registrar contractual compliance							
			GAC has historically taken a strong interest in Registry and Registrar contractual compliance enforcement concerning WHOIS obligations, as well as other elements that affect abuse and							
	10.3. 15.1. 15.2.		enforcement concerning WHOIS obligations, as well as other elements that affect abuse and security (See e.g., GAC Hyderabad and Copenhagen Communiqués3). Furthermore, the GAC							
GAC	10.3, 15.1, 15.2, 16	•	has held regular exchanges with the ICANN Compliance Team, in writing and at its plenary meetings, in an effort to strengthen compliance mechanisms.	ок	none	none	Agreed			
	11, 14, 15 and		We would appreciate additional information from the SSR2-RT about how it reached the	Clarify the SSR utility of recommendations and			-			
RySG	16		decision to effectively duplicate the recommendations from a previous Review Team.	encouragement of Board action	clarify	clarify	Clarified			
			The RySG is also concerned with some of the definitions set out by SSR2 in Appendix A, in particular the definitions of "security threat" and "DNS abuse", and note that we do not support							
			particular the definitions of "security threat" and "DNS abuse", and note that we do not support the definitions provided. Given SSR2 recommends policy work by the ICANN community to							
			define "DNS abuse" and "security threats," the RySG would ask SSR2 to refrain from creating its own definitions. The RySG appreciates that it is useful for the SSR2 to have a working							
			recommendations made by SSR2, or adopted as community definitions by the Board. The report seems to repeatedly conflate the terms to broadly encompass undesirable activity							
RySG	11, 14, 15, 16		related to both DNS/infrastructure abuse, security threats, and IP/content-related abuse.	Clarify use of established definitions	clarify	clarify	Clarified			
			#Recommendation 13 to 20: They are all related to DNS Abuse and the DNS operations and are "high" priorities. We recommend that the Review Team proposes a dedicated team, like a							
			way/metric to assess the effectiveness of the implementation of those recommendations by a future SSR Team rather than making specific recommendations at this point. We do not fully							
			support the recommendations relating to the opening of DAAR data to private firms for their internal abuse department. This soutisel of the role of ICANN and we do not support recommendations related to this topic. On a							
			internal abuse department. This is outside of the role of ICANN and we do not support recommendations related to this topic. On abusive naming we reject the call to replicate the							
			existing systems that were the result of GNSO policy making with regards to trademark confusion and string similarity, again we do not believe that this is within the mandate of the							
NCSG	13, 14, 15, 16, 17, 18, 19, 20		confusion and string similarity, again we do not believe that this is within the mandate of the SSR2 RT	Disagree; within scope	none	none	Disagree: within SSR scope			
11000	17, 10, 10, 20		we also welcome Recommendations 13 and 19, which encourage the collection of data on mitigating abuse to improve Domain Abuse Activity Reporting (DAAR) in order to improve both	Disagree, Willin Scope	TION C	none	Disagree, within core scope			
			mitigating abuse to improve Domain Abuse Activity Reporting (DAAR) in order to improve both measurement and reporting of domain abuse. Most importantly, the GAC supports the							
			suggestion that ICANN org should publish DAAR reports identifying Registries and Registrars							
GAC	13, 19		whose domains most contribute to abuse according to the DAAR methodology.	ок	none	none	Agree			
		ICANN org should publish DAAR reports	We note the 13.1.1. recommendation to publish DAAR reports in a way that "identifies registries and registrars whose domains most contribute to abuse according to the DAAR							
		that identify registries and registrars whose domains most contribute to abuse	registries and registrars whose domains most contribute to abuse according to the DAAR methodology". We recommend going further than that in expanding the detail of the public							
BC	13.1.1	according to the DAAR methodology.	DAAR reports to report activity by registry, by registrar and by measured security threat.	Agreed	clarify	clarify	Agreed; clarify			
			Regarding recommendation 13.1.1, commercial entities already publish such data. Some of these reports include flawed, incomplete, or false positive information, so it is should not form							
			the basis for ICANN to "name and shame" contracted parties. There are existing compliance							
		that identify registries and registrars	activities to address registrars or registries that may not be complying with the RAA or RA. The recommendation does not mention the benefits and or possible issues such publication could				Disagree; and all			
RrSG	13.1.1	whose domains most contribute to abuse according to the DAAR methodology.	create. This recommendation should be subject to community consideration before further	Disagree; and all recommendations are subject to public			recommendations are subject to public comment			
NOU	10.1.1		duton.	Comment	lione	none	ICANN Org has had several			
		ICANN org should publish DAAR reports that identify registries and registrars					years of input and intermittent discussions without			
		that identify registries and registrars whose domains most contribute to abuse	ICANN org is in discussions with relevant stakeholders as to how best to provide data to inform	ICANN Ore has had several years of input and			discussions without demonstrable change. Iterative			
ICANN Org	13.1.1	according to the DAAR methodology.	policy discussions.	intermittent discussion without demonstrable change.	none	none	action is needed			
			The RySG notes that any RO can be the target of abusive activity (through no fault of the RO)							
			and that publishing a list of victims is unlikely to curb actual abuse. We suggest instead focusing on understanding how various RO business models either (or both) prevent or mitigate abuse. DAAR data, without context, is just uncorroborated raw numbers. For instance,				We suggest RySG provide			
			mitigate abuse. DAAR data, without context, is just uncorroborated raw numbers. For instance,				additional information to			
			a particular RO may experience a 2% abuse rate as a daily average, however that number says nothing about how fast yesterday's domains were taken down and if the domains on				DAAR data, if they feel it's			
RySG	13.1.1		today's list were also on yesterday's list.	ок	none	none	useful.			
		ICANN org should make the source data for DAAR available through the ICANN	For recommendation 13.1.2, it is not clear what source data DAAR entails, and whether the							
		Open Data Initiative and prioritize items	For recommendation 13.1.2, it is not clear what source data DAAR entails, and whether the sources have been vetted by contracted parties and the broader ICANN community. The							
		"daar" and "daar-summarized" of the ODI Data Asset Inventory for immediate	recommendation is not very clear what source data for DAAR entails. This data is likely published elsewhere, and it is not ICANN's remit to provide a clearinghouse for information that							
RrSG	13.1.2	community access.	can be obtained elsewhere.	Disagree	none	none	Disagree.			
ICANN Org	13.1.2	SSR2 Recommendation 13.1.2: "source	Requests for clarification of terms	add footnote	add footnote	add footnore	Clarified			
IGAININ OIG	10.1.2	uata	requests for clarification of lettils	aud loutilite	auu iouditite	auu iuulilule				
		ICANN org should make the source data					"publishable data" is a term ICANN Org applies too narrowly			
		for DAAR available through the ICANN Open Data Initiative and prioritize items					and results in the publishing of DAAR data that is not actionable			
		"daar" and "daar-summarized" of the ODI Data Asset Inventory for immediate		"publishable" is a term ICANN Org applies too narrowly and results in publishing of DAAR data that is not			or enlightening and falls considerably short of what non-			
ICANN Org	13.1.2	Data Asset Inventory for immediate community access.	Publishable DAAR-related data is already slated to be included in the Open Data Platform.	and results in publishing of DAAR data that is not actionable or enlightening.	none	none	considerably short of what non- contracted entities requested.			
			Most of the entities that collect and report on behaviors labeled "abuse" by DAAR, do so for a			i .				
			specific, often commercial, purpose. This data is not freely available to the world and ICANN has repeatedly explained that the contracts with the feed providers do not allow them to make							
			has repeatedly explained that the contracts with the feed providers on not allow them to make the data public. We recognize that many in the community want to see this data for free and, indeed, so do many ROs. However, simply listing it as a Recommendation will not make it so.							
RySG	13.1.2, 13.1.3		indeed, so do many ROs. However, simply listing it as a Recommendation will not make it so.		none	none	Disagree			
		ICANN org should publish reports that include machine-readable formats of the								
		include machine-readable formats of the data, in addition to the graphical data in								
RrSG	13.1.3	current reports.	If recommendation 13.1.3 is referencing DAAR, then again, these feeds are already available.	nope	none	none	Disagree			
		ICANN org should publish reports that include machine-readable formats of the								
ICANN Ora	13.1.3	data, in addition to the graphical data in current reports.	With the inclusion of DAAR data into the Open Data Platform, this recommendation will be implemented	nope	clarify	clarify	Disagree; clarified			
ICANN Org	13.1.3	current reports.	Impremented	nope	uarry	udilly	ызаугее, стапте0			

						1			
Source	Rec	Title	Comment	Preparer Comments	Actions	General Actions	Response		
		ICANN org should provide assistance to the Board and all constituencies,							
		stakeholder groups and advisory							
		committees in DAAR Interpretation,	# 1 1 1 1 1 1 1 1 1 1 0000 PT						
		notice and advisory activities that would	It is unclear what sort of assistance the SSR2 RT is recommending; ICANN org asks the SSR2 RT to clarify this point. ICANN's Office of the Chief Technology Officer (OCTO) is particularly						
		enhance domain name abuse prevention	interested in ensuring people understand what DAAR data says (and doesn't say). Clarification from the SSR2 RT would be helpful.						
ICANN Org	13.1.4	and mitigation	from the SSR2 RT would be helpful.	clarify	clarify	clarify	Clarified		
							Agree, but ICANN Org has an		
							important role to play in informing the community about		
							abuse so policy and other		
							activities are based on an		
RvSG	13.1.4		ICANN org has provided a tool and information. It's the community's job to determine if that information should inspire future work.		none	none	understanding of abuse and SSR		
11,000	10.1.4		The RySG is concerned about a number of the recommendations that direct the Board or		Horic	none	maters		
			ICANN org to make changes to the Registry Agreement and note that it is not possible for the Board or ICANN org to unilaterally impose new contractual conditions on Contracted Parties.						
			Board or ICANN org to unilaterally impose new contractual conditions on Contracted Parties.						
			Amendments to the registry agreement are only possible via a formal amendment process or						
			the adoption of consensus policies. We would therefore encourage the Review Team to reconsider the recommendations that direct the Board or ICANN org to make changes to the						
RySG	15, 16		registry agreement as we do not believe they can be implemented.	addressed above	none	none	Misundertood recommendations		
			ICANN org also welcomes this opportunity to provide feedback on the operational feasibility of implementation of the SSR2 RT recommendations. This comment addresses a number of recommendations that, as currently drafted, may not be feasible for ICANN org to implement						
			recommendations that as currently drafted may not be feasible for ICANN and to implement						
			because the recommendation would appear to require ICANN org to act outside of its mission				the team welcomes additional,		
			and scope (for example, SSR2 recommendations 15, 16, 19.2), or the expected impact of				specific suggestions on clarifying		
	15. 16. 19.2. 5.		implementation is not clearly defined (for example, SSR2 recommendations 5, 6, 18, 20).	the team welcomes additional, specific suggestions on			and strengthening recommendations from ICANN		
ICANN Org	6, 18, 20		because the recommendation voud appear to require (CANN org to act outside of its mission and because the recommendations voud appear to require (CANN org to act outside of its mission and people for example, SSR2 recommendations 15, 16, 19,2), or the expected impact of implementation is not clearly defined for example, SSR2 recommendations 6, 6, 18, 20). (CANN org encourages the SSR2 RT to further engage with ICANN org exclusive state of the commendations of the state	ICANN Org, if they have them	none	none	Org, if they have them		
	., .,		Finally, the GAC welcomes the fact that several recommendations dovetail with priorities the	3, 11, 11			3, 11, 111		
			GAC has endorsed for its Public Safety Working Group, such as the inclusion of ccTl Ds in						
			DNS Abuse mitigation efforts and the investigation of the security implications of DNS encryption technologies (Recommendations 15, 17, 29 and 31). The GAC invites the Review Team to consider how the work of the PSWG and other parts of the ICANN community could						
			Team to consider how the work of the PSWG and other parts of the ICANN community could				Agreed; will look for those		
GAC	15, 17, 29, 31		contribute to these efforts.	not sure what else to do	none	none	opportunities		
		Ensure access to registration data for							
		parties with legitimate purposes via	For recommendation 15.3.1, this is most likely not possible because it would violate fundamental rights of data subjects. Furthermore, the correlation between registration data and						
RrSG	15.3.1	compliance mechanisms.	fundamental rights of data subjects. Furthermore, the correlation between registration data and the effectiveness of actual threat mitigation is unknown.	clarity	clarify	clarify	Disagree; clarified		
			Regarding recommendation 15.3.2, such research is already possible under many data			· ·			
			Regarding recommendation 15.3.2, such research is already possible under many data protection laws. However, current ICANN community processes do not comply with these laws,						
		Establish and enforce uniform Centralized	and as such, the RrSG recommends that the ICANN community focus on how research in a manner that complies with existing laws (rather than making proposals that might violate those laws). The RrSG notes that ICANN OCTO has mentioned several times it does not next.						
		continuous access for SSR research	laws) The RrSG notes that ICANN OCTO has mentioned several times it does not need						
RrSG	15.3.2	purposes.	access to registrant data for research purposes.	OCTO is wrong	none	none	Disagree		
			The IPC would point out that many brand owners who operate Brand TLDs under Spec 13 are reluctant to have their future branding decisions telegraphed by means of the public access to						
			reluctant to have their future branding decisions telegraphed by means of the public access to the CZDS. The Brand TLDs would encourage a more nuanced treatment of CZDS access				Suggest Brand TLDs engage		
IPC	15.3.2		which recognizes the particular nature of a TLD.	ок	none	none	community on this issue		
			The IPC is supportive of the intent behind these recommendations but notes that ICANN has						
			The IPC is supportive of the intent behind these recommendations but notes that ICANN has no control over ccTLDs and the ccNSO. The RT is encouraged to revisit and refine this to						
IPC			acknowledge this lack of control. We seek clarification as to the changes to registrant				Report indicates ccTLD		
IPC	15.3.3, 15.3.4		information proposed by 15.4: what changes specifically are proposed?	Report makes ccTLD involvement voluntary	none	none	involvement is voluntary		
		Immediately instantiate a requirement for	ICANN org notes that this recommendation does not include justification as to why ICANN and others would need a vetting process and encourages the SSR2 PT to provide this in its final						
		the RDAP services of contracted parties to	others would need a vetting process and encourages the SSR2 RT to provide this in its final report. Further, it is not clear to ICANN org which entities the SSR2 RT intends to be vetted or how that vetting can be implemented. With regard to the request in this recommendation to "immediately instantiate a requirement", ICANN org notes that neither it nor the Board can						
		white-list ICANN org address space and	how that vetting can be implemented. With regard to the request in this recommendation to						
		establish a process for vetting other entities that RDAP services of contracted	"immediately instantiate a requirement", ICANN org notes that neither it nor the Board can						
		parties will whitelist for non-rate-limited	unilaterally impose new obligations on contracted parties. The RA and RAA can only be modified either via a consensus policy development process or as a result of voluntary contract						
ICANN Org	15.3.5	access.	negotiations (as noted by the Board).	clarify	clarify	clarify	Clarified		
		Contracted parties with portfolios with less	MarkMonitor supports a reduction in domain fees for retaining an agreed low percentage of abusive domain names in a registrar portfolio. We believe that in the continuous fight to prevent DNS abuse and reduce "bad actors", the positive reward for good practices should be and the property of the pro						
		than a specific percentage (e.g., 1%) of	abusive domain names in a registrar portfolio. We believe that in the continuous fight to prevent						
		commercial providers or DAAR) should	welcomed initiative to encourage registrars to take a proactive approach in the monitoring and						
		receive a fee reduction (e.g., a reduction	welcomed initiative to encourage registrars to take a proactive approach in the monitoring and enforcement actions in relation to DNS Abuse. MarkMonitor supports this novel approach to						
		from current fees, or an increase of the	incentivise rather than chastise. In order to ensure that this is implemented successfully, we						
MarkMonitor	16.1.1	and provide a Registrar with a discount).	need clear definitions of the percentages to identify eligibility and also the identification method should also be defined and explained alongside the reduced fees and/ or discount.	OK	none	none	Agreed		
		Contracted parties with portfolios with less					9		
		abusive domain names (as identified by commercial providers or DAAR) should							
		receive a fee reduction (e.g., a reduction							
		from current fees, or an increase of the							
		current per domain name transaction fee and provide a Registrar with a discount).							
		Waive RSEP fees when the RSEP filings							
		clearly indicate how the contracted party intends to mitigate DNS abuse, and that							
		any Registry RSEP receives pre-approval							
		if it permits an EPP field at the Registry							
		level to designate those domain names as under management of a verified							
		under management of a verified Registrant.	For recommendation 16.1.1 and 16.1.3, how will ICANN offset the discount (which will result in				SSR2 is not responsible for		
RrSG	16.1.1, 16.1.3		a lower revenue for ICANN)?	Verisign's multi-million dollar gift to ICANN	none	none	budget allocations		
		L	MarkMonitor also supports this recommendation. As with 16.1.1 the success of this initiative will be with the clear and express definition of "verified", the mechanisms that are relevant for						
		Registrars should receive a fee reduction for each domain name registered to a	will be with the clear and express definition of "verified", the mechanisms that are relevant for the verification process and what the thresholds are relating to maximum submissions. This						
		tor each domain name registered to a verified registrant up to an appropriate	the verification process and what the thresholds are relating to maximum submissions. This shall require more consultation with contracted parties and the review team shall need to						
MarkMonitor	16.1.2	threshold.	ensure that this is implemented effectively.	OK	none	none	Agreed		
		Registrars should receive a fee reduction							
		for each domain name registered to a verified registrant up to an appropriate	Recommendation 16.1.2 will be difficult to implement in light of privacy laws. There are also questions, such as how can registrars verify registrants, what will prevent bad registrars from	Should be addressed in ICANN Org's implementation			Disagreed; should be addressed		
RrSG	16.1.2	threshold.	questions, such as now can registrars verify registrants, what will prevent bad registrars from faking the verification, and does verification mean lower abuse?	plan	none	none	in implementation plan		
		SSR2 Recommendation 16.1.2: "verified	-		T .				
ICANN Org	16.1.2	registrant"	Requests for clarification of terms	add footnote	clarify	add footnote	clarify		
			As noted in the section "Requests for Clarification of Terms," ICANN org seeks clarification of						
			the term "verified registrant". Is the SSR2 RT referring to potential activities to "verify" the						
			recommendation in light of ongoing discussions and work related to the Furnnean General						
			recommendation in light of ongoing discussions and work related to the European General Data Protection Regulation (GDPR), including the feasibility of conducting such activities in						
			light of GDPR, and the impact on ICANN contracts. Specifically, depending on what the SSR2						
		Registrars should receive a fee reduction	light of GDPR, and the impact on ICANN contracts. Specifically, depending on what the SSR2 RT means by "verified registrant", conducting verification activities could have potential implications for ongoing discussions related to access to non-public registration data as well as						
							Clarfied; severa issues raised		
CANING	16.1.2	domain name registered to a verified registrant up to an appropriate threshold.	and managing the data related to verified registrants? Additionally, ICANN org encourages the SSR2 RT to consider the potential budgetary implications of a fee reduction.	numerous registries and some registrars. Other issues should be addressed in implementation plan.			should be addressed in		
ICANN Org	10.1.2	registrant up to an appropriate threshold.	SSR2 R1 to consider the potential budgetary implications of a fee reduction.	sriuuiu ue addressed in implementation plan.	none	none	implementation plan		
		Waive RSEP fees when the RSEP filings clearly indicate how the contracted party							
		intends to mitigate DNS abuse, and that any Registry RSEP receives pre-approval							
		any Registry RSEP receives pre-approval							
		if it permits an EPP field at the Registry level to designate those domain names as							
		under management of a verified	MarkMonitor supports this offering and appreciates the approach of ensuring that there is an						
MarkMonitor	16.1.3	Registrant.	incentive for the registry in addition to registrars.	ok	none	none	Agreed		

Source	Rec	Title	Comment	Preparer Comments	Actions	General Actions	lesponse	
ICANN Org	16.1.3	clearly indicate how the contracted party intends to mitigate DNS abuse, and that any Registry RSEP receives pre-approval if it permits an EPP field at the Registry	ICANN org notes that there are no fees for submitting Registry Services Evaluation Folicy requests (RESPs.) Fees only apply (FLANN or gledefies) potential security or stability concerns and utilizes a Registry Services Technical Evaluation Fanel (RSTEP). Is the SSR2 Fredering to RSTEP fees in this recommendation Further (CANN org notes concerns regarding the feasibility of implementing this recommendation as pre-approval may not be possible (CANN org notes organized). The consideration of the Feat Track RSEP Process could be utilized to meet the intended outcome of this recommendation.	clarify	clarify	clarify	starfiied	
MarkMonitor	16.1.4	registries on domains that are identified as abuse and security threats and are taken down within an appropriate period after	MarkMorinor supports this recommendation, however we are aware that the implementation of this scheme may require considerable effort from a policy perspective. As this specific process of the provision of what is an important price of the provision of what is an important price of the provision of what is an important price of the provision of what is an important price of the provision of what is an important price of the provision of what is an important price of the price of th		none	none	greed; should be addressed in inplementation plan	
RrSG	16.1.4	abuse and security threats and are taken down within an appropriate period after	It is not clear how recommendation 16.1.4 can be tracked. As with other parts of this recommendation. It is subject to gaminglabuse. It could also lead to a new version of frontrunning (e.g. register a domain, track traffic for 25 days, then suspend for "abuse" to get money back if the domain is not generating sufficient parking page revenue or a malicious campaign ends).	Agreed; see above	none	none	ienefit outweigh risks; should be ddressed in implementation lan	
ICANN Org	16.1.4	registries on domains that are identified as abuse and security threats and are taken down within an appropriate period after	ICANN org repeats its comments above with regard to SSR2 Recommendation 15.1, namely international results of the deposition promised in the regarding the definition of "DNS above" as well as metriculreporting for above. Additionally, ICANN org has concerns with regard to how this recommendation could be reflectively implemented and encourages the SSR2 RT to consider potential sisses with gaming and mis-aligned incentives. For example, contracted paraller night where less incentive to gourt adjastist the creation of domains intended for misuse or might in some cases even profit from their creation if they end up being "free" of ICANN transaction feature.	See previous comments	none	none	ilisagree – evolving abuse iscussions should be used as ne couse to not the section; sks should be mitigated by inglementation plan	
IPC	16.1.4		The IPC does not understand what is intended by this recommendation. It would appear to create the possibility of a bad-actor registrar selling such names and then rapidly taking them down, thereby receiving payment both from the registrant and a refund from ICANN. This presumably is not the intent, so the RT may wish to clarify this recommendation.	Clarify	Clarify	Clarify	clarified	