To:      Göran Marby, CEO and President, ICANN;
           Cherine Chalaby, Chair of the Board of Directors, ICANN;
           Rod Rasmussen, Chair, ICANN SSAC;
           David Conrad, CTO, ICANN

From:  M³AAWG (Messaging, Malware and Mobile Anti-Abuse Working Group)

Date:   April 5, 2019

Subject: Comments Pertaining to the Domain Abuse Activity Reporting (DAAR) System

The Messaging, Malware and Mobile Anti-Abuse Working Group (M³AAWG) develops cooperative approaches for fighting online abuse.  We are an industry association bringing together stakeholders in the online community to work in a confidential, trusted forum.  M³AAWG seeks to mitigate botnets, malware, spam, viruses, DoS attacks and other online exploitation and is the largest global anti-abuse industry association with more than 200-member companies worldwide.

M³AAWG membership has reviewed the report on the findings from the Domain Abuse Activity Reporting (DAAR) system dated 13 January 2019, produced by ICANN's Office of the CTO Security, Stability and Resiliency team.

The general consensus of our membership is that the report presents valuable findings that are closely aligned with our mission. Unfortunately, the DAAR report stops short of providing actionable information that would allow our members to take a more proactive stance to reduce the various forms of abuse.

To this end, we ask ICANN to direct staff to augment the current and future reports to include the actual count of domain names per registrar and per TLD associated with each category of security threat explored. This information will allow our membership, as well as other industry participants, to improve their respective security stance and ensure the overall stability, security and resiliency of the domain naming system and the Internet.  For example, this information will empower service operators to directly assess the effectiveness of the controls that are currently deployed at different levels and study better methods to proactively address existing security threats.

We believe that publishing this aggregated data on a per-registrar and per-TLD basis is compatible with the licensing agreements in place with the data vendors whose information is used in the preparation of the DAAR reports. More importantly, we also believe that ICANN is a neutral party that is committed to both the principles and work of transparency and accountability, and is in a distinctly unique position to be the authoritative source for this information now and in the future.

We respectfully request that the ICANN organization, community and Board consider this request and provide a response on or before April 30, 2019, so our membership can discuss this further at our upcoming meeting in Budapest, Hungary.

Thank you in advance for your consideration.

Sincerely,
Jerry Upton, Executive Director, M³AAWG (Messaging, Malware and Mobile Anti-Abuse Working Group)
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