

1. I believe that any domain name that is wholly or partly descriptive or contains a dictionary word should not have additional protection and in these cases it should be much harder for a complainant to prove abuse has occurred

2. I agree none of these are necessarily evidence of abuse.

3. I agree

4. I believe an upfront fee of 25% should be charged as this will reduce frivolous complaints.

5. I cannot see how this could be enforced.

6. Procedure: I believe that either the complainant should not be allowed to reply to the respondent's submission unless it is as a non-standard submission or the respondent should also have the right to reply.

Drafting: Everything should be written in plain English

Expert decisions: I believe the experts should disregard any statements made in a complaint that is not backed up with evidence. The experts should not conduct their own research but make their decisions exclusively on the evidence provided in the complaint/response as any research carried out could be viewed as biased toward one party.

Abusive registrations: I disagree that policy 3(a)(ii) should be softened and believe that evidence of abuse should be ongoing at the time of complaint or within a very short time prior to the complaint (say 30 days) as I believe it unfair for someone to lose a domain name over something minor that occurred once several months or years previous.

7. a. I believe the word limit should be increased especially where the complaint contains more than one domain name.

b. The response time should be increased to 30 working days to allow respondents who are on holiday/ live outside of the UK adequate time to reply. To avoid unnecessary delays in cases where the respondent fails to reply an intent to reply should need to be lodged within 15 working days to qualify for the extended time.

c. I believe any complaint should be proven beyond reasonable doubt not judged on the balance of probability.

d. Domain names are increasingly worth a lot of money and as such I think a number of complaints are made for financial gain instead of genuine concern over abuse. I think that if a complaint is upheld the domain name should be permanently suspended and not automatically transferred to the complainant. The domain name should only be transferred to the complainant if they can prove it would be highly damaging to their

business not to do so and the decision to transfer should be decided by Nominet and not the expert. This would stop complaints raised for financial gain, attempts at reverse hijacking and would probably lead to an increase in complaints being settled at the mediation stage.

e. I think one of the major failings of the DRS is it is too broad and tries to resolve any and every type of complaint and because of this bad decisions are made. I think Nominet need to realise that some complaints are too complex and can only fairly be judged via the courts. I think Nominet needs to narrow the scope of the DRS so it follows rigid guidelines with very little open to interpretation by the experts. I think the mark of a good system is one where anyone can look at a complaint, follow the procedure and reach the same conclusion as the expert.

f. When a decision is overturned on appeal I think the cost of the appeal should be refunded and the costs absorbed by Nominet and would expect a large rise in the number of appeals made if this is adopted.