

# Lock States

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## 1. Introduction

The term 'lock state' is generally taken to mean:

“A mechanism by which one party in a system can prevent actions by another party.”

This paper assumes that definition and then discusses a variety of issues related to this subject, with the intention that this will stimulate debate at the PAB and enable the executive to produce a later paper with some policy recommendations.

This paper does not contain any recommendations, but it does contain a number of questions.

## 2. Issues Raised

These are the issues that have been raised by various customers that appear to be good candidates for solving by a lock state mechanism.

### 2.1 Issues raised by registrars

#### 2.1.1 Persistent abuse of the opt-out mechanism

Registrars have complained that they have customers who persistently change their registrant type and then opt-out of the WHOIS through our online services, when they as the registrar know this is inappropriate because the registrant is a trading entity. The registrar then acts on each notification they receive from us and changes the setting back.

Registrars in this position have asked if they could set a lock to prevent the registrant changing the opt-out through our online services.

#### 2.1.2 Deliberate supply of false address details

Registrars have complained of registrants who have used our online services to change their address details to false details, in order to deliberately obscure their details on the WHOIS. The registrars complain that they need to check the notifications returned from our systems and correct the change.

Registrars in this position have asked if they could set a lock to prevent the registrant changing their address details through our online services.

### 2.1.3 Prevent registrar change through our online services

Registrars have asked if they can prevent a domain being transferred to another registrar by the registrant using our online services. A number of reasons have been given for wanting this functionality, including credit control and providing a higher security service.

We introduced the facility for registrants to transfer domains directly with us after taking legal advice. This is now a well established process and registrants expect to be able to carry this out without the registrar being able to prevent it. Most registrars also accept it as an established process.

## 2.2 Issues raised by registrants

### 2.2.1 Prevention of fraudulent registrant transfer

Many registrants have asked if they can set a lock to prevent their domain name from being transferred to another registrant. This is to prevent the fraudulent transfer away of their domain.

With the current, paper-based system this remains a possibility, though our staff are well-trained and adept at spotting such fraudulent attempts. However even the move to our online services may not remove the need as there are likely to be registrants concerned that a registrar or reseller will add themselves as a contact and abuse the system that way.

### 2.2.2 Forcing of renewal

Registrants have asked if they can set a flag that forces their domain name to renew, even if the registrar chooses not to.

It may be argued that this functionality is provided by the invoice that Nominet sends directly to the registrant if the domain remains unpaid after expiry.

### 2.2.3 Prevention of fraudulent cancellation

Registrants have asked if they can set a lock to prevent their domain name from being cancelled through the fraudulent use of our services.

With the current, paper-based system this remains a possibility, though our staff are well-trained and adept at spotting such fraudulent attempts. However even the move to our online services may not remove the need as there are likely to be registrants concerned that a registrar or reseller will add themselves as a contact and abuse the system that way.

### 2.2.4 Prevention of fraudulent registrar change

Registrants have asked if they can lock a domain to prevent it being moved to a different registrar through our online services, though this might equally well apply to preventing the registrar from releasing the domain to another registrar.

## 3. Questions

In order to formulate policy proposals we ask the PAB the following questions:

1. Should a policy on lock states be considered, or are the issues raised so interlinked with the nature of the three way contract and our processes, that they cannot be considered in isolation?
2. Is it appropriate to introduce lock states that enable the registrar to prevent the registrant from carrying out certain functions?
3. Is it appropriate to introduce lock states that enable the registrant to prevent others, possibly including the registrar from carrying out certain functions?
4. If lock states under the control of the registrant are introduced then should the registrar also be able to set/unset them?
5. What other issues are there that might be solved by lock states?

We look forward to receiving your views on this.

