

Lock States

PAB SUB-COMMITTEE REPORT

1. Introduction

At PAB meeting 58 (July 2008), the subject of lock states was discussed. It was agreed at this meeting that a PAB sub-committee should be formed to discuss this issue and report back to the PAB. Jarrod Robinson volunteered to Chair the sub-committee meeting which was held at Victoria Park Plaza, 239 Vauxhall Bridge Road, London, SW1V 1EQ on 20 August 2008. The sub-committee meeting was attended by Gordon Dick, Nora Nanayakkara and Michael Toth from the PAB and Laura Hutchison from Nominet. Andrew Bennett and Mark Healey sent their apologies.

Previous PAB discussions on this topic have ended without a resolution as a consensus couldn't be reached on how a registrant could lock a domain name without taking control away from the registrar.

2. Why do we need a lock state?

Registrants, especially brand owners, with a portfolio of valuable domain names would like to have the facility to lock their domain names at the Registry level for protection. There is a feeling that this would offer more security in the event of their registrar being hacked. It would also be helpful if registrars and Nominet could have the facility to lock a domain name to prevent repeat abuse of the opt-out facility. It was also suggested that now Nominet has moved to providing the majority of services online, there is a perception that this isn't as secure as the previous manual system.

3. Registry lock

The sub-committee group agreed that having a Registry lock on the Opt-out function was a good idea. They didn't feel that this would be a contentious issue among registrars as it wouldn't affect the relationship between a registrar and a registrant and would reduce repeat abuse of the opt-out function therefore reducing the number of complaints about incorrectly opted-out domain names.

The sub-committee discussed the current DRS system and how when a DRS case is initiated it prevents a domain name being moved to another registrar, or transferred to another registrant. The group questioned whether this constituted a "lock state".

The lock state sub-committee agreed to recommend to the PAB that Nominet should have a registry lock to be used in line with the domain name terms and conditions.

4. Registrant lock

The sub-committee group agreed that there should be the facility for a registrant to lock their domain name. The group discussed a registrant lock with regards to the following functions:

- To prevent a registrant transfer
- To prevent Cancellation/ surrender
- To force renewal
- To block a tag change

There was some discussion about how a registrant lock would be implemented. It was felt that if it was a function within Registrants Online then this was taking control away from registrars and encouraging registrants to transact directly with the registry. However, as a domain name can only be transferred or cancelled via the Registrants

Online system, the sub-committee agreed that there should be the facility within Registrants Online for a registrant to set a lock to prevent a domain name being cancelled (surrendered) or transferred.

The sub-committee group discussed how and where a registrant lock should be implemented and removed. The outcome of this discussion was that the sub-committee group decided to recommend to the PAB that a registrar can choose to allow their registrants access to a lock state service via Registrants Online. It was suggested that Nominet could provide a co-branded version of Registrants Online for those registrars that choose to allow lock states to be used on their tag in order to encourage good practice. A registrant would log into Registrants Online in the usual way and is then taken to a co-branded system (unique to each tag) that allows them to set or remove various locks on their domain name(s).

5. Registrar lock

The sub-committee discussed whether a registrar should have the facility to lock an opt-out. However after some discussion it was felt that the abuse of the opt-out function wasn't a wide-spread issue and having the facility for a registrar to lock this would cause more problems that it solved.

The sub-committee noted the difference between Nominet's registry and gTLD thin registries and were concerned about the legal implications of allowing a registrar to lock any aspects of a domain name and felt this function would be somewhat meaningless as there would have to be an over-ride function via the registry anyway for cases of registrars going out of business, or being hacked or to safeguard against malicious registrars.

6. Lock state sub-committee recommendations

The lock state sub-committee agreed to make the following recommendations to the PAB:

Nominet should have a registry lock to be used in line with the domain name terms and conditions.

There should be the function within Registrants Online to allow a registrant to set a lock to prevent the automatic transfer or cancellation (surrender) of their domain name(s) regardless of whether a registrar is subscribed to the lock-state service.

A registrar should be able choose to allow their registrants access to an extended lock state service via Registrants Online. It was suggested that Nominet could provide a co-branded system so that a registrant logs into Registrants Online in the usual way and is then taken to a co-branded system (unique to each tag) that allows them to set various locks on their domain name(s). These locks will include the function to lock a domain to a particular tag and to lock the domain name to renew. This would mean that if a domain name wasn't renewed in advance of the expiry date then extra measures would be put in place to notify the registrar (and the registrant). This service would include the following features:

The default of this service would be for all registrars to be opted in and then they can choose to opt out if they wish.

When a domain name is moved from an opted-in tag to an opted-out tag through Registrants Online, then the registrant will get a warning that the new registrar doesn't allow them to set lock states. If the registrant chooses to complete the tag change then all lock state settings will default to being unlocked.

When transferring between two opted-in tags then all details currently locked on a domain name will remain locked.

A registrar should be able to view the locks that are in place on a domain name on their tag.

A registrar should have the ability to turn on a registrant lock on behalf of their customer but not to turn it off again.

The tags subscribed to the lock-state service should be regarded as public data and the information made available to all.