

Firstly, we welcome the decision to re-evaluate the DRS process and have the following points to make, the numbering of which bears no relation to the questions as stated in the Consultation document:

1. Introduction of a fee (option 2, preferably at the lower £50 mark) to commit to the DRS procedure is a fundamentally good idea.

However, may I suggest that a pre-DRS process may exist whereby the interested party in a domain can announce intention to the domain holder interest in the domain. On a number of DRS proceedings that we have been involved in, many simply respond to the Nominet letter that the interested party may take ownership of the domain where they were uncontactable previously. We suspect that with "Nominet" in the title of the document, they are more inclined to read the request. This should be a generic statement that if it is not responded to, DRS proceedings could then commence.

This system would incur a minimum cost to Nominet and perhaps a £1 filing fee would be appropriate. This system should also further reduce strain on both the DRS procedure and the subscribers of the .uk tld.

2. After the initial DRS letter has been sent, we would like to see a regulation introduced whereby a rebuttal is required rather than optional. Upon no receipt of rebuttal, it should be considered uncontested and rights to the domain removed.

3. With regard to unfair registrations, we agree that pay-per-click advertising doesn't necessarily imply an abusive registration, but removal of this clause would cause even more domains to be registered for this purpose, thereby devaluing the .uk tld and the use of the internet.

4. Having a large portfolio of domain names should have no bearing over an abusive registration claim.

5. In rebuttal to Rex Wickham's statement on this matter we would disagree and say that it was essential for the DRS proceedings to be operated by Nominet.

6. A little more clarity in who the Experts are would be useful from the outset of the procedure, as indeed would the process for the first-time user.

Regards,

Edward Bellamy