

## Have your say!

Please give us your feedback on these proposals by answering the following questions:

What domains should we release?

This document contains respondents between 51 and 51 inclusive.

**Do you agree that two letter domain names should be released for registration in co.uk, org.uk, net.uk and me.uk as recommended by the PAB?**

- Yes
- No

**Please give comments**

I see nothing wrong with 2-letter domains being released for registration, providing that the process for their release does not offer advantage to companies or individuals able to run scripts (as has so often been the case with names that drop after deletion). It is essential that the release of these names should be transparent and offer no advantage to any party. Therefore, they should either be sold for their market value (via transparent auction process), or they should be made available by lottery to render the distribution subject to chance, and thereby also eliminate the scope for trade insiders to run scripts etc or otherwise gain uneven advantage over other applicants.

**Do you agree that one character domain names should be released for registration in co.uk, org.uk, net.uk and me.uk as recommended by the PAB?**

- Yes
- No

**Please give comments**

I see nothing wrong with 1-letter domains being released for registration, providing that the process for their release does not offer advantage to companies or individuals able to run scripts (as has so often been the case with names that drop after deletion). It is essential that the release of these names should be transparent and offer no advantage to any party. Therefore, they should either be sold for their market value (via transparent auction process), or they should be made available by lottery to render the distribution subject to chance, and thereby also eliminate the scope for trade insiders to run scripts etc or otherwise gain uneven advantage over other applicants.

**Do you agree that existing country codes under ISO 3166-1 such as fr, de, es, us etc be released for registration in co.uk, org.uk, net.uk and me.uk as recommended by the PAB?**

- Yes
- No

**Please give comments**

There is some argument that this might create confusion, but overall I agree these letters could also be released.

**We outlined the technical reasons why com.co.uk, org.co.uk and net.co.uk should not be released. Do you agree with these exceptions?**

- Yes
- No

**Please give comments**

On grounds of potential public confusion, yes.

**Do you agree that existing generic top level domains (e.g. biz, info) should be released for registration in co.uk, org.uk, net.uk and me.uk as recommended by the PAB?**

- Yes
- No

**Please give comments**

It seems likely to be confusing to some users and I don't see the need or the point of causing unneeded possible confusion.

**Do you agree that existing .uk second level domains (e.g. co, org, ac, me, ltd) should also be released for registration in co.uk, org.uk, net.uk and me.uk?**

- Yes
- No

**Please give comments**

I strongly oppose the confusing use of names like .nhs or .sch at other levels. These should definitely be safeguarded and reserved for use by the entities already responsible for .sch, .nhs, police etc. There is no way that important public networks should be mixed up or confused by a user public with identical names used at a different level. Nominet should protect and safeguard the best possible working arrangements to isolate and identify .nhs and .sch and .police in the public interest.

**Do you agree that "uk" should continue to be reserved from registration in co.uk, org.uk, net.uk and me.uk as recommended by the PAB?**

- Yes
- No

**Comments**

It's obvious. It just adds to confusion and makes no sense at all to have uk.co.uk etc.

**We propose to take the same approach for two letter, one character and the other previously unreleased domains (e.g. pro.co.uk). Do you agree with this proposal?**

- Yes
- No

**Please give comments**

My position is this: I see nothing wrong with 1 or 2-letter domains being released for registration, providing that the process for their release does not offer advantage to companies or individuals able to run scripts (as has so often been the case with names that drop after deletion). It is essential that the release of these names should be transparent and offer no advantage to any party. Therefore, they should either be sold for their market value (via transparent auction process), or they should be made available by lottery to render the distribution subject to chance, and thereby also eliminate the scope for trade insiders to run scripts etc or otherwise gain uneven advantage over other applicants.

**The PAB recommended a two stage release process: a first round for holders of registered trademarks, and a second round for names not taken by rights holders, open to holders of unregistered rights. Do you agree with this recommendation?**

Yes

No

### **Please give comments**

I agree with rights being protected providing speculators are not able to benefit and steal names through recent speculative use of trademarks - otherwise, there will be virtually no open access for the public, as was seen in the .eu names release when thousands of copyrights were created to gain names in the sunrise phase. Furthermore, fiascos and abuse such as the sunrise processes of the .info release must be avoided, so you must avoid at all cost a situation where fake sunrise claims are made, then when these get cancelled later, the released names are picked up by insiders with scripts. I see nothing wrong with 2-letter domains being released for registration, providing that the process for their release does not offer advantage to companies or individuals able to run scripts (as has so often been the case with names that drop after deletion). It is essential that the release of these names should be transparent and offer no advantage to any party. Therefore, they should either be sold for their market value (via transparent auction process), or they should be made available by lottery to render the distribution subject to chance, and thereby also eliminate the scope for trade insiders to run scripts etc or otherwise gain uneven advantage over other applicants.

**The PAB recommended a cut off date for qualifying rights for IP rights holders. They suggested 1996 and 2002 as possible dates. What do you think would be a suitable cut off date?**

The difficulty is that this is arbitrary: perfectly legitimate companies may have been set up in 1997, 2003, or 2009. Furthermore, unless the processes are very tight, you will end up with a situation like .eu or .info where fake sunrise claims are made, and if these subsequently prove to be fake, the names may be released and cherry-picked by people who run scripts when the name is deleted, rendering the distribution of prime domain names unfair, uneven, and inaccessible to ordinary members of the public.

**We propose that initially commercial organisations should have priority in.co.uk and charities and not for profit organisations should have priority in org.uk. Do you agree with this approach?**

Yes

No

**We propose to hold a sealed bid auction for domain names where rights holders are competing, and for domain names not taken up by rights holders. Do you think there is a fairer way to allocate the first registration of these domain names?**

Yes

No

### **Please give comments**

Why would you favour a sealed bid approach? Shouldn't it be as accessible as possible and as transparent as possible to the public? Why not either have a public auction with phone in facility, or use already existing online auction processes? People should have the right and opportunity to know what bid they are bidding against, and not have to bid blind. Clearly a precise market price can be achieved through an \*open\* and \*public\* bidding system - and if the auction is carried out online, then that is not only more transparent and visible to all, but enables far more people to participate right up to the last bid. Or they should be made available by lottery to render the distribution subject to chance, and thereby also eliminate the scope for trade insiders to run scripts etc or otherwise gain uneven advantage over other applicants. Open auction or lottery seem best methods, depending on whether you set a priority on market value or wish to widen domain name use and accessibility to a wider public via lottery.

**We propose to hold a Dutch auction for the general release (“landrush”) of domains not taken up by rights holders. Do you think there is a fairer way to allocate the first registration of these domain names?**

- Yes
- No

**Please give comments, particularly in relation to the starting price for any Dutch auction.**

Just a straightforward auction would be better - more transparent and more accessible to all. Just let people bid whatever price they want in a straightforward auction.

**We plan to run this whole exercise on a cost recovery basis, and any surplus funds generated from auctions would be donated to Nominet Trust, a charitable organisation established by Nominet with the objects including the education, relief of financial hardship and protection of children in the area of the Internet and information technology. Do you agree with this approach?**

- Yes
- No

### Comments

Noble, but this seems completely arbitrary. As UK domain names are essentially a UK asset, I suggest a wider distribution of surplus funds to a wider cross-section of UK charities.

**Do you have any other comments or suggestions about the proposed release of these domain names?**

The release \*must not\* get hijacked by speculators. This has happened again and again in domain name releases all over the world. Nor should some fiasco be followed by the deletion of falsely claimed names, since the system of uk name deletions is already compromised by the ability of a tiny minority to run scripts and pick up many 'dropping' newly released names. \*All\* these names should, at any stage in a process, be equally accessible to all the public, at least if they can afford to buy the domains in the market place (or, if that itself is offensive to some, then a lottery system of release instead). I would like to add that if you are proposing an equitable system of names releases for these particular names, why oh why don't you apply the same system to all deleted domains, instead of the situation for many years, where the general public cannot register expired domains, because all the popular oines get 'grabbed' by trade insiders running scripts to pick them up the second they drop back into the market as available. This insider advantage has operated way too long and should be urgently addressed - not oinly should \*all\* the uk public be able to have a first chance to register these 1 or 2 letter domains... they should have a first chance (or opportunity to bid) for all the desirable domains that drop back into the market, week by week. I believe some Nominet participants have themselves made profit and benefited from running scripts to grab .uk domains, and this situation of running scripts to 'game' the system and exclude the general public from realistic and equal opportunity to register a desired expiring domain, has been going on for years!

### 12. Please give us your contact details

Name

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Company name/Organisation name

individual