

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 9 and 9 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 agree that they should be released, but not precisely as recommended by the PAB. In essence, Round 1 (release to IPR holders) should be abandoned, but registrations should only go live if, after a 2 month period, no DRS claim is made. There is no reason to give the surplus to the trust specifically; why should this particular surplus-producing activity be any different from any other.

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 agree that they should be released, but not precisely as recommended by the PAB. In essence, Round 1 (release to IPR holders) should be abandoned, but registrations should only go live if, after a 2 month period, no DRS claim is made. There is no reason to give the surplus to the trust specifically; why should this particular surplus-producing activity be any different from any other.

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

I agree that they should be released, but not precisely as recommended by the PAB. In essence, Round 1 (release to IPR holders) should be abandoned, but registrations should only go live if, after a 2 month period, no DRS claim is made. There is no reason to give the surplus to the trust specifically; why should this particular surplus-producing activity be any different from any other.

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

Why pick com.co.uk, org.co.uk and net.co.uk, but not (for instance) uk.co.uk, de.co.uk and so forth; it seems illogical to seek to prevent people ascertaining a list of non-registered .com domain names, but not .de domain names. Either you should protect every TLD (which is the original intention) or none. As for nameserver traffic, caveat emptor - what happens if someone registers google.co.uk?

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

Why pick com.co.uk, org.co.uk and net.co.uk, but not (for instance) uk.co.uk, de.co.uk and so forth; it seems illogical to seek to prevent people ascertaining a list of non-registered .com domain names, but not .de domain names. Either you should protect every TLD (which is the original intention) or none. As for nameserver traffic, caveat emptor - what happens if someone registers google.co.uk?

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 agree that they should be released, but not precisely as recommended by the PAB. In essence, Round 1 (release to IPR holders) should be abandoned, but registrations should only go live if, after a 2 month period, no DRS claim is made.

The introduction period should work like me.uk. Start off at (e.g.) 655,360 per domain name, and halve the price every day till you reach five pounds.

If someone does not have rights to the domain name and someone else does, the money won't be refundable, so they will think carefully before bidding.

There is no reason to give the surplus to the trust specifically; why should this particular surplus-producing activity be any different from any other.

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

See above.

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

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

The DRS is there to protect rights holders. Why invent another process?

Simply do FCFS, like other domains, but don't take the domains live until a challenge period has passed. If any of the domains are in the DRS at the end of this period, do not take them live until the outcome is known

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?

A cut off date is irrelevant. If someone has rights over a domain name, why should the relevance of the date of those rights be different for a 2 letter domain than a 3 or 4 letter domain.

Please give comments

Assuming this box is meant to be for the question re priority re commercial / non-profit organisations, no I don't agree. This would be the thin end of the wedge for non-FCFS approaches elsewhere.

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

This is a defective suggestion caused by the defective process of allowing rights holders in first.

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.

A dutch auction is a process of obtaining the lowest price for an object. You can't mean a Dutch auction, or I will bid 1 penny per domain name to take them off your hands.

You should instead offer the domains at a very high price, and progressively divide that price by a fixed number as time periods pass.

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

There is no reason to do anything particularly different for this particular potentially-surplus-producing activity than any other. There is no sensibly explained rationale for hypothecating the potential surplus here. I would suggest Nominet instead retains it as a defence fund against the inevitable barrage of lawsuits.

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

This appears to be one of Nominet's less sensible ideas.

Rights holder provision seems not to have been considered in a joined up manner. The letters "DRS" do not appear in the PDF at all. What threshold does one have to reach to have "rights" in a name? Can I have ab.co.uk on the basis people know me as "AB"? What about a trader with an unregistered two letter trademark they have demonstrable goodwill in? All these questions have been considered for DRS, and there appears to be a fair amount of unnecessary wheel re-inventing going on here.

Also, apologies if the answers to these boxes don't link to the questions, but there appear to be questions with 2 boxes and questions with no boxes on the survey.

Specifically on the question of auctions etc, I would suggest you retain the services of a game theoretician / auction expert.

12. Please give us your contact details

Name

Alex Bligh

Company name/Organisation name

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