

## 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 107 and 107 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**

A qualified yes. Owing to their (perceived) value Nominet should offer them at a substantial premium, and should initially require evidence of substantial prior use. Potentially the premium could be through a limited tender to those bodies deemed to meet the prior use requirements. For ones where no-one provided evidence of prior use, they could then be auctioned.

Thus it would be absurd if, for example, BP plc did not gain the www.bp.co.uk URL, or if the Financial Times did not end up with ww.ft.co.uk, but for ones where there is no obvious candidate, a free market could prevail.

**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

**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**

Not least because some, such as IT, are already out there and ICANN can always add new TLDs.

**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

**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

**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

Probably. For example a charity dealing with Myalgic encephalomyelitis (ME) should be able to seek [www.me.org.uk](http://www.me.org.uk), using the prior use rules outlined above.

**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

I see no reason why "uk" should be treated any differently from "gb".

**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

I agree that trademark holders should have first call, but as not everything can be trademarked (see my example concerning Myalgic encephalomyelitis - ME, above) there should also be the possibility for non-trademarked prior use to be taken into consideration and - occasionally - potentially overriding trademarks in a different field.

**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?**

2004 (six years). Even this may need shortening if a merger or similar has led to a new two letter acronym gaining widespread recognition.

**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**

Please see my comments below about the need to hold back unused .org.uk ones for future use, rather than to auction them to commercial companies for a short term profit. I am happy with the approach for .co.uk domains.

**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.**

I think it is more important that Nominet achieves a realistic price for domains, rather than distributes them all. Indeed in future, a new plc might even want to align its name to a still available domain, rather the other way around. And it would be particularly helpful if unused .org.uk domains were not placed on general sale (and I write from a UK registered charity) but could be disposed of on a more equitable basis. The actual starting price might vary with the perceived value - thus tv.co.uk might be worth more than vt.co.uk.

**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

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

Only to reiterate the point that I would not want not for profit organisations, including charities such as ourselves, running at risk of unfair competition from speculators and domain sitters. (We would have liked to get our .co.uk equivalent, but we beaten do it by a domain farmer who is making no real use of it other than selling advertising to people who mistype in our real .org.uk address.)

**12. Please give us your contact details**

**Name**

Ian Byrne

**Company name/Organisation name**

National Energy Foundation