

.net.uk Rules Consultation

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Overview

The .net.uk Second Level Domain (SLD) is currently reserved for domains used by Internet Service Providers (eg demon.net.uk)

Nominet's Policy Advisory Board (PAB) would like to know if you think this should remain the case and if so, what rules should apply to .net.uk.

The actions we could take include the following options:-

- Close .net.uk completely to new registrations.
- Restrict .net.uk for ISPs/network operators who meet a strict eligibility criteria.
- Open .net.uk with a charter to indicate its suggested use for ISPs/network operators but without restriction that enforces such use.
- Open .net.uk completely with everyone being encouraged to register.

We would welcome your views and recommendations on this policy issue and encourage you to read this paper and complete the questionnaire included.

This is your chance to have a say what happens to .net.uk. Please take it.

Summary of Questions

There are 13 questions at the conclusion of this paper on the following topics;

- The function of a domain name.
- The perception of the .net.uk SLD.
- Defining ISP/Network Provider.
- Options available for the .net.uk SLD.

Note:

The timescale of the consultation and a glossary of terms are included at the end of this document.

Introduction

Second level domains can broadly be categorised as follows:

Open – No restriction on registration or use of the SLD is applied.

Chartered – The SLD is “intended” for a particular type of registrant/use, but this connection is not enforced within the rules.

Restricted – The registration and/or use of the SLD is restricted within the rules to a specific set of criteria. The restrictions can have a wide or narrow scope.

Examples of chartered and restricted SLDs

“.co.uk”	Chartered – Anyone can register but the domain is “intended” for commercial organisations/projects.
“.org.uk”	Chartered – Anyone can register but the domain is “intended” for non-commercial organisations/projects.
“.me.uk”	Restricted – Registrations are restricted to individuals rather than companies. Specific rules enforce this. No rules require registrants to register a domain similar to their name.

“.ltd.uk” and “.plc.uk”	Restricted – Registrations are restricted to limited and public limited companies respectively with strict rules regarding the association between the domain and company name.
“.gov.uk”	Restricted – Registrations restricted to certain types of government departments ¹
“.net.uk”	Restricted – Registrations restricted to companies meeting specific criteria.

It is clear that the scale of restrictions placed on domains can vary from quite strict to almost the equivalent of an open domain. It is worth noting that some exceptions exist with regard to domains that were registered prior to specific rules being written.

¹

See <http://www.cabinetoffice.gov.uk/e-government/resources/handbook/html/1-9-2.asp> for details

Origins

The “.net.uk” SLD is currently restricted to registrations by “network providers” who meet a specific set of criteria. The definition of a network provider originates from a document called “RFC1591” which defines the purpose of the “.NET” top level domain as follows:

“NET – This domain is intended to hold only the computers of network providers, that is the NIC and NOC computers, the administrative computers, and the network node computers. The customers of the network provider would have domain names of their own (not in the NET TLD)”

Whilst this definition (with specific criteria to interpret it) has been enforced in .net.uk, this has not been the case with the .net top level domain (TLD) which has led to questions about whether this is the right policy. The use of the .net TLD has shifted to simply becoming an alternative TLD for .com albeit a far less popular one. It is still very common within ISP networks too.

All the criteria which must be fulfilled to qualify for a .net.uk SLD can be basically summarised as follows:

1. Only computers of "network providers" (network operations centres, administrative computers, etc.) will be within a domain in this SLD. This means customers of an ISP should not be using this for e-mail, websites, etc.
2. The registrant must be an Internet Service Provider AND the domain name is similar to the applicant's name.
3. The registrant must be ONE of the following:
 - (a) a registered UK/NI company (at Companies House in the UK or the Company Registry of NI.);
 - (b) a partnership or sole trader;
 - (c) a UK Government department, local government body or associated government funded organisation;
 - (d) a recognised academic institution in the UK; or
 - (e) a registered charity.
4. The registrant must be EITHER:
 - (a) an Local Internet Registry (LIR) registered with an Regional Internet Registry (RIR), or
 - (b) have an Autonomous System Number (ASN) containing hosts in the UK listed with an RIR which can be reached from the Internet.

Full details of the rules, including details of restrictions on the *use of the* SLD (e.g. in e-mail addresses) etc. can be found on this web page:

<http://www.nic.uk/ReferenceDocuments/Rules/SpecificRulesForThenetukSlid/>

Strengths and weaknesses of the current rules

Although the RFC and Nominet rules do refer to "network providers" rather than merely "Internet Service Providers", the boundary of who does and does not consider themselves an "ISP" or "network provider" is not clear.

Benefits of maintaining the status of .net.uk as an ISP/network SLD:

- It can be useful to recognise that a particular host is part of the ISP's network rather than customer infrastructure. Many ISPs allow customers to use their domains (e.g. xxxxx@nildram.co.uk in an e-mail address) so it can be difficult to work out who is an ISP staff representative and who is a customer from the e-mail address²
- The SLD is an alternative for ISPs whose .co.uk domain may have already gone. It is less likely that a company would go through the process of satisfying the rules only for branding purposes.
- Allowing unrestricted registrations in ".net.uk" would result in duplication as registrants in ".co.uk" would be likely to register the same domain with the ".net.uk" suffix to protect and ensure it is not used in a manner that would be against their interests.

Benefits of changing the current rules

- It has been suggested that the rules are "too strict" and don't really define what an "ISP" is.
- It is questionable whether a large number of Internet users know the meaning of the ".net.uk" SLD and understand the restrictions. The lack of a restriction in ".net" may confuse this further.
- The use of the ".net.uk" SLD is potentially lower than it could be under another system. A system similar to ".co.uk" and ".org.uk" would probably encourage more use of the SLD.
- The process of checking and handling complaints regarding the eligibility of registrants could be removed if the SLD was open/chartered.
- It is difficult to police "use" of the domain name (e.g. that an ISP doesn't allow customers to use .net.uk e-mail addresses)
- It may be perceived as unfair that one industry has its own SLD.

Issues to note are:

- The current process of vetting applicants is manual. Although there is scope for automation, the number of applications are not significant, and most failed applications are easy to spot.³
- There is a process for creating new SLDs. Details can be found on the Nominet website .

² It should however be pointed out that domains are not an alternative to digital signatures, etc.

³ <http://www.nic.uk/SecondLevelDomains/CreationOfNewSecondLevelDomains/AboutTheCreationOfNewSlDs/>

Assumptions

- The current criteria for registering .net.uk domains do not allow all companies who would class themselves as "ISPs" to register names.
- The definition of an "ISP" is subjective as the term is widely used for a number of different services offered to users. Any restrictive definition will exclude some parties who think they should be registrants in the name space.
- Any rule changes will not affect domains which have already been registered until they expire and are cancelled, or transferred.

Definition of an ISP / Network Provider

In order to provide a base for ideas on the possible definitions of an “ISP” or “Network Provider”, here are a few criteria some of which are weaker i.e with little restriction and some which are stronger i.e more restrictive. (The words “ISP” and “network provider” are used interchangeably). If any restriction is applied, it could be constructed from one/more of the following, or other criteria.

An “ISP” is a company that declares itself to be an ISP	WEAK
An “ISP” is any company that provides “Internet access” to third parties	WEAK
An “ISP” is any company that provides any kind of “Internet hosting” services to third parties	WEAK
An “ISP” is a company that has a ‘router’ which has BGP4 sessions with upstream providers	WEAK
An “ISP” is a company that is classed as a Communications Provider under the Communications Act 2003 and provides its customers with an Ofcom-approved Alternative Dispute Resolution service	STRONG
An “ISP” is a company that is a Nominet member and tag holder	STRONG
An “ISP” is a company that has their own Autonomous System (AS) Number	STRONG
An “ISP” is a company that is a “Local Internet Registry” (LIR)	STRONG

NOTE: These are not exhaustive. They are intended to illustrate the problem of defining an ISP if that is a requirement.

Consultation Questions

We would ask that you respond with a yes/no wherever possible, although if you need to expand in addition to this on a question, please do so.

Function of a domain name:

- 1 What do you believe is a function of a domain name?

Perception of the “.net.uk” SLD:

- 2 Would you class yourself as working in, or being part of the ISP/network provider industry?
- 3 Do you associate “.net.uk” with an ISP/network provider-type company?
- 4 On a scale of 1 to 5, do you believe that the “average Internet user” associates “.net.uk” with an ISP/network provider? (1 = No association, 5 = Strong association)
- 5 (a) How far do you see .net.uk as a duplicate for .co.uk, .net or other TLDs/SLDs?
(b) Would this be different if anyone could register a .net.uk domain?

Definitions of an ISP/Network Provider:

- 6 How would you attempt to define an “Internet Service Provider (ISP)” and what would you say are typical characteristics of an ISP? Are these objective criteria which are easy to verify automatically?

- 7 How would you attempt to define a "Network Provider" and what would you say are typical characteristics of a Network Provider? Are these objective criteria which are easy to verify automatically?
- 8 Do you believe there are sufficient differences which can be clearly defined between an ISP and Network Provider? If you believe the domain should be restricted to some definition, should this be inclusive of both an ISP and Network Provider, or one of them?

Options

- 9 What general option do you favour, and why?
 - a. Close .net.uk completely to new registrations.
 - b. Restrict .net.uk for some definition of ISP/network operator with strict eligibility criteria.
 - c. Open .net.uk with a charter to indicate its *suggested* use for ISPs/network operators but without a restriction enforcing such a recommendation.
 - d. Open .net.uk with no specific charter (everyone is encouraged to register)
 - e. Another option. (please explain)
- 10 If you believe there should be a restriction of some kind, how should this be structured? (see previous page for some ideas)
- 11 If there is a restriction on the registrant, do you believe that the rules for ".net.uk" should require some kind of presence in the UK?
- 12 If registration of ".net.uk" domains is restricted to a specific type of organisation, should its use (e.g. subdomains, e-mail addresses, etc.) also be restricted [for names registered under such rules]?
- 13 If the .net.uk SLD is opened up for registration with no or very limited controls, would the benefits of more registrations be defeated by any problems such as more defensive/duplicate registrations?

Next Steps

Following this consultation, the PAB's .net.uk Working Group plans to produce a policy recommendation to be presented, via the Policy Advisory Board, to the Nominet Board. It will then be up to the latter to decide how to proceed.

Glossary

ASN	Autonomous System Number; This is used in routing traffic on the Internet. Each ISP with their own defined routing policy will have an ASN. Usually (but not always), this also means the company is an LIR. This could be said to run your "own autonomous network" as you can make decisions about how your traffic is routed. Without an ASN, your provider network will make these decisions.
Charter	A "charter" describes the "intended use" of a second level domain.
ISP	Internet Service Provider
LIR	Local Internet Registry; In most cases this means being a member of RIPE NCC (an RIR). To be a RIPE member you need to pay certain fees which amount to significantly more than £1,000 per year.
NIC	Network Information Centre – Part of the Internet infrastructure. Typically this has been used for registries such as Nominet.
NOC	Network Operations Centre – Part of the Internet infrastructure. ISPs and network operators have NOCs which are facilities which their network operates in, or are controlled from.
PAB	Policy Advisory Board – A committee set up by Nominet to advise it on policy matters. More details can be found at http://www.nominet.org.uk/Pab

RIR	Regional Internet Registry; For example RIPE NCC (www.ripe.net) which manages the IP address allocations and assignments in Europe.
RFC	An RFC or "Request for Comments" is a document which specifies an Internet Standard. (See www.rfc.net).
SLD	Second Level Domain – The second element of a domain name, starting from the right. For example in "www.nominet.org.uk", the SLD is ".org.uk"
TLD	Top Level Domain – The right-most component of a domain name, such as ".com" or ".uk"
Working Group (WG)	A policy working group is an online community of persons interested in a particular policy issue such as the ".net.uk" rules. See the end of this document for a link for more details.

How to respond

The consultation period runs from 19 December 2005 to 19 March 2006.

Responses to this consultation should be sent by e-mail to netuk-consultation@nominet.org.uk.

You are urged to try and answer with a "yes" or "no" where possible, although you are more than welcome to expand on your answer. Please prepend answers with the question number.

All responses will be published on the Nominet website unless Nominet determines that the response is defamatory or for other justifiable reasons cannot be published.

Any enquiries can be directed at the working group chair:

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This document was prepared for the .net.uk working group. Further information on the group can be found here:

<http://www.nic.uk/policy/wg/net/>

The working group is an online community open to anyone who wishes to join the mailing list and contribute. The above link will provide details on how you can subscribe to the list. The working group chair would be happy to address any questions you may have about participating further.

This document does not constitute Nominet policy nor does it express the views of its authors or contributors, the .net.uk working group or the Nominet Policy Advisory Board.