

FYI, I am a tagholder/registrar.

I am concerned that Nominet have an over-inflated sense of how significant they are to the average registrant. The current system of having individual registrars register domains with Nominet, rather than registrants doing it directly, works well. So why are Nominet now determined to push their role closer to the registrants?

You are correct that many registrants are not aware of who Nominet are and what they do but I disagree with the implication that they need, should or want to know - even if we tried to explain it to them, they won't take notice and won't care. They just want their domain name as quickly as possible.

For the vast majority of users who experience no problems, there is no need to understand Nominet or the registrant/registrar interaction. And I think that this is a good thing.

I'm not saying that Nominet don't provide a valuable service, but it is a service that realistically is only needed when something has already gone wrong with the registrant/registrar relationship.

It will be very difficult for Nominet to ensure registrars behave "nicely". However, if a registrar provides a poor service, novices think "registrar X is rubbish", not "Nominet is rubbish" or ".uk is rubbish", because they don't know who Nominet is.

Nominet's top priority should be to provide maximum customer service to registrars - the benefits will then cascade to registrants.

Why can we still not manage our Nominet accounts on the web? Why does everything need to go through the automaton? If I have a junior member of staff, they need to know how the automaton works in order to, for instance, change the name servers of a customer's domain. These tasks should be available through a secure website. Ideally registrars would have their own systems to do this, but many (especially smaller registrars) do not.

On to the questions from the consultation document:

1. Yes - but the question and proposals are very vague. This could be done very well, but it could also be done very badly. So generally I would say proceed, but with caution.
2. Enhancements to the existing contract will be necessary for this to be of any use at all - otherwise the "dodgy" registrars have no reason to improve their behaviour.
3. Better documentation of the automaton would be useful. For example, what exactly are the validation rules applied to each field? However, I don't think that the system is so complex that it requires specific training courses. And it certainly doesn't need accreditation - nobody is going to get excited about a qualification for registering and managing .uk domains. Nominet really isn't that big a part of our lives.
4. No - this is not within Nominet's remit and would be overkill. If registrars need help structuring their business, they should seek professional advice (or possibly question whether they are qualified to be in the business).
5. Fast response to email/telephone/postal communication, both to registrars and registrants. As mentioned above, providing registrars with web based account management to perform tasks currently managed

through the automaton would also allow registrars to deal with registrant queries more quickly and easily.

6. The registrant terms should be as brief as possible to have any hope of people actually reading them. I know that by not reading them potential registrants are in the wrong, but we all know that when faced with a huge terms and conditions document plenty of people simply ignore it.

7. I think it's about right as it is. Registrants should be able to contact Nominet if they have a problem, but for 99% of registrants this is not necessary. The confirmation of registration letter is enough of an introduction so that registrants know Nominet is there should they have a problem.

8. No - this will be a nightmare to manage, since it's all based on qualitative assessments. The workload for dealing with disputes relating to this scheme would be massive.

9. Broadly yes, but the devil is in the detail as usual.

10. Perhaps for tag changes, but nothing else (I'll talk more about tag changes later).

11. Yes - registrars should be obliged to make their resellers aware of the relevant terms relating to .uk registrations. However, a reseller being in breach of these terms should not immediately place the registrant in breach - they must be given time to correct the problem (e.g. do whatever the reseller is not doing). A bad reseller should not tarnish a good registrar, unless the registrar does not act responsibly in dealing with the problem.

12. No - this should be considered separately after Nominet has completed this review of its own procedures. I.e. let's take one step at a time.

13. Yes. All parties should be obliged to update information that they know to be incorrect, or at the request of a relevant third party (e.g. if registrant asks registrar to update their email address). However, it is difficult for registrars to be certain that the data they have been provided by a customer is accurate, so they should not be penalised in these cases.

14. No - this is again suggesting Nominet should regulate wider business practices.

15. No - enforcement would be too qualitative.

16. Registrars should be obliged to update their procedures within a reasonable timescale so that their registration/order systems allow registrants to enter the most accurate information (e.g. full range of fields available, all registrant types supported, etc.) However, see point above about improved documentation for the automaton.

17. Yes and yes.

18. No - people don't care, they won't read it, and it might put them off.

19. This is impossible to comment on without some examples.

20. Reactively - ongoing assessments would require too much staff intervention. More staff means higher costs, which someone ultimately

must pay. Nominet's operations team should be able to handle the majority of disputes, but a framework for independent appeal should be made available.

21. Sanctions are clearly required, otherwise what is the point?

Clearly there is a problem with a minority of registrars not behaving well. However, the document points out that there are several thousand registrars to choose from and we therefore have a very competitive market. If a registrar provides a bad service, a registrant is able to take their business elsewhere.

Unlike the gTLD system involving locks and email authorisations, the Nominet tag system makes changing registrar brilliantly simple. The only potential problem is a registrar failing to allow a registrant to change the tag on their domain.

Currently the workaround for this problem is changing the tag with Nominet - but the process is slow and expensive. Nominet should improve this process by:

1. Removing the charge (with the possible exception of cases where the registrant has not even tried to change the tag through their current registrar).

2. Allowing registrants to change their tag via the Nominet website using the password that was sent to them with the registration confirmation. This could then be processed instantly with no manual intervention.

The second point may sound open to abuse, but remember that many registrars allow registrants to change their domain tags via their own websites which are protected only by a username/password. If anything, Nominet's password would probably be more secure due to the way it is distributed. For registrants who have forgotten their Nominet password, it can be sent to the registrant email address or in the post.

I believe that these suggestions would allow the market's competition to drive up standards and weed out the registrars providing a bad service.

In conclusion, the consultation document makes both excellent and ridiculous suggestions. Nominet must recognise what its role should be and first concentrate on doing this job well, not on extending its remit.

James Robinson