



BCS Response to the Nominet Consultation on “Raising Industry Standards”

Introduction

BCS is pleased to contribute to the Nominet’s Consultation on “Raising Industry Standards”.

BCS is the leading professional body for the IT industry. With over 50,000 members, the BCS is the Professional and Learned Society in the field of computers and information systems.

BCS is also responsible for setting standards for the IT profession. It is spearheading the IT in Professionalism programme and is also leading the change in the public perception and appreciation of the economic and social importance of professionally managed IT projects and programmes. In this capacity, the Society advises, informs and persuades industry and government on successful IT implementation.

BCS is determined to promote IT as the profession of the 21st century especially as IT is affecting every part of our lives. Therefore, BCS is pleased to take this opportunity to comment on this issue.

Comments to specific questions

In the time available, the following specific comments result from a consultation with some of our members:

1. Do you support the proposal to improve standards associated with the .uk domain name space?

Yes

2. How could standards be improved? For example, could this best be done within the existing contract framework between Nominet and the 11 registrars, or through some kind of “added value” mark – a form of certification or additional commitment – to allow different levels of service depending on the nature of the registrar’s business?

A single improved contract framework. Multiple levels of service simply lead to confusion.

3. Should we provide more support for developing the technical knowledge of registrars (for example training, e-learning packages, guides/manuals, better structured user interfaces)? If you are a registrar, what did you find most difficult in establishing your account?

N/C

4. Should we provide support to registrars to help develop business processes related to selling and maintaining .uk domain names?

N/C

5. How can we ensure consistent and high-quality service to registrants?

N/C

6. We are committed to improving clarity and transparency for all our communications. We believe that the existing registrar contract could be made clearer and easier to understand. Do you have specific comments on the current document?

N/C

7. How can we ensure the correct balance between back-up support provided by Nominet and the first-line support provided by the registrar?

N/C

8. Should there be a discount from Nominet for those registrars that provide more comprehensive support for their customers?

Anything that encourages improved support for registrants is a good move.

9. Should the contract between Nominet and the registrar contain dispute resolution conditions to address registrar-registrant disputes?

Yes

10. Should Nominet set performance criteria, for example with timescales for updates? If so, how should these be enforced?

N/C

11. Should the contract between Nominet and the registrar apply to the actions of the registrar's resellers?

Absolutely yes. Resellers need to operate to the same standards as registrars.

12. Should Nominet work with other bodies in the Internet sector in the UK to ensure better coherence between different codes of practice?

This would be helpful if it can be realistically achieved. Harmonisation is always difficult.

13. The current registrant contract requires registrants to ensure that their details are accurate and kept up to date and that the WHOIS opt-out is used correctly. Should all three contracting parties – Nominet, the registrar and the registrant – have a responsibility to correct information that they are aware is incorrect

(including inappropriate use of the WHOIS opt-out by trading entities)? And how could this be built into contracts between the three parties?

Registrars, resellers and registrants should bear the primary responsibility, with Nominet acting as arbiter in cases where responsibility for a breach is in dispute.

14. Should Nominet require the registrar to publish information and if so what? How could this be enforced?

N/C

15. Should registrars be required to publish service level agreements as part of their commitment to Nominet and to their customers? How could this be enforced?

N/C

16. How can we improve the quality of registrant details?

N/C

17. Should there be an explicit requirement for domain names only to be registered in the name of the registrant unless the registrant requests otherwise? Should there be an automatic right to correct misallocation?

This would assist in eliminating several grey areas - particularly with respect to the notional control of names sold by resellers to private citizens and small businesses.

18. Should registrars be required to publish clear information about the role of Nominet, including contractual requirements with Nominet?

Emphatically yes. The contract between a registrant and their registrar or reseller should include a clear specification of this.

19. Should new registrars qualify against predefined objective criteria? If so, what?

N/C

20. How should we monitor quality and compliance with standards and/or best practice? Should this be done reactively (i.e. in response to complaints)? Or through on-going assessments? And how should decisions be made (e.g. through Nominet's operations team, through an independent mechanism)?

N/C

21. What should we do if it goes wrong? Should we apply sanctions for failing to comply with the registrar agreement? And, if so, what? And how should we assess appeals?



N/C

BCS would welcome the opportunity to have discussions with officials on the points made to further clarify the implications of our comments.

Mike Rodd for the British Computer Society (BCS)
April 2006.