

Hi,

We operate as a registrar principally in support of commercial spin-off activity within our university.

It seems that this (very wordy) consultation paper highlights one problem that Nominet seems to have - not catering for certain classes of registrar. We've found a number of recent changes have simply added more beaurocracy and overhead to our activities. For example, persistent problems with the billing department of Nominet since the changes with autorenew (usually Nominet failing to take payment automatically then sending us reminders that we should never have been sent).

The fact that this paper is so wordy is also an indication that Nominet is out of touch with smaller registrars. 14 pages and 21 questions(!)

We actually now use another registrar for much of our university registrations rather than Nominet directly. I think that highlights the scale of the issues that we face as a small registrar (we now have low tens with Nominet and low hundreds with the 3rd party registrar).

Regarding the specific questions in the paper, we feel the best approach is to use a carrot of a Gold Standard. This is something that customers can search for and rely upon for a certain quality. It is not something that we would take extra steps to meet, as we're not actively seeking business outside the university. However, from what you describe I would hope we'd meet most of the requirements anyway. Adding 'policing' as the default would be an unnecessary step, in our view. A voluntary Gold Standard however seems a good thing, so long as customers (registrants) know what it means.

Our position also means we have other issues with the proposed changes. For example, we usually register domains in our own name because they are most usually for use that is legally still part of the university, or for research projects, etc. More overhead (paperwork) to justify doing this would be bad. If registrars are misbehaving, penalise them, don't penalise the ones who are not.

Where registrant info does need to be changed, Nominet should seek to allow such changes to be made as close to free of charge as possible.

Training would be welcome, though it's probably too late for most. The RIPE LIR courses would be a standard to try to emulate. But at the same time the interface to services could be modernised somewhat to make it simpler for the smaller registrars.

In terms of bad reputations for .uk, the one thing you could do to improve that is to take action to stamp out domain squatting. We find the fact that you seem to allow squatters to poll the database for lapsing domains so easily quite surprising. This might imply that Nominet is just happy to take the fees rather than uphold some integrity in the available domains marketplace. Are there steps you can take to ensure domains are in active use rather than held speculatively for sale by registrars?