

We would like to thank Nominet for the opportunity to participate in this process and hereby submit our comments in regard to "Raising Industry Standards".

It has been our observation over the last years that the multitude of "Nominet Registrars" and their variety in size, customer base, business model, as well as their different perception of what the duties of a Registrar are, have caused confusion at the end user level about what their actual rights are and who is responsible for what service. As result of this confusion Nominet had to introduce procedures to handle and protect end users rights which are costly and cause confusion at the registrar level.

In light of this experience we would be very supportive to an initiative of Nominet to mature and strengthen its registrar contracts. Most of the ideas proposed in the consultation paper cater this goal very well but should be subject to a more in depth discussion in operational terms (e.g. how exactly would these changes look like).

Thought all ideas proposed in the consultation paper have their merits there are some areas that would be especially beneficial for the transparency of Nominets procedures and hence of special value for the satisfaction of the end user.

#### 1.) Registrar Accreditation Process

to achieve a good and standardized understanding of the rights and duties of a registrar right from the start. A mandatory workshop would certainly help a lot to communicate all the necessary technical and legal information.

#### 2.) Clear Communication Rules

standardized information that must be shown at the time of registration in regard to the contractual relationships as well as the rights and duties of the registrant.

#### 3.) Clear Failover Measures

standardized process that is invoked at the time a Registrar has ceased trading

Thinking of the composition of Nominets registrar base it becomes very clear that the general adoption of such changes will take considerable time and therefore unavoidably lead to two types of registrars. Since such setup is not very beneficial for the overall transparency the registrars should be incentivised for the adoption, to speed up the cutover process, with a special status e.g. Gold Standard, that comes along with more rights and a closer relationship to Nominet. The adoption should nevertheless be mandatory for all registrars and being concluded by all of them in an appropriate period of time.

Respectfully

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