

The following is UKERNA's response to the Consultation on the Scope of Nominet, sent in response to consultation paper at http://www.nominet.org.uk/digitalAssets/8109_Scope_consultation_paper.pdf.

Summary

UKERNA considers that the core business of Nominet is to provide high-quality Internet registry services in the UK. We therefore welcome proposals to expand the types of identifiers for which Nominet provides services, to include ENUM and other identifiers in addition to the current DNS registry. We also believe that it is to the benefit of the UK Internet that Nominet should use its knowledge and experience to assist registries in other countries. However we consider that running networks or registries for other countries would dilute Nominet's focus on technical, operational and regulatory issues in the UK and would thereby risk harming the service it currently provides.

Detailed Comments

We consider that the optimal set of Objects for the company falls between Options 2 and 3 presented in the consultation paper. Taking Option 3 as a basis:

Sections 3.1 to 3.3 (.uk Network Information Centre) should be adopted; Sections 3.4 to 3.5 (Other Registry Services) represent an expansion beyond the UK and should not be adopted; Sections 3.6 (Research Funding) and 3.7 (Dispute Resolution) should not be adopted in their current, very widely drawn, form; if a case were made that these activities were necessary to support Nominet's core business then we might support a more narrowly drafted clause; Section 3.8 (Training and Education) should be adopted; Section 3.9 (Security development) is better done by other organizations than Nominet and should not be adopted; Nominet should work with those organisations rather than starting its own activity; Section 3.10 (Consultancy) is much too widely drawn and should not be adopted; if a case were made that these activities were necessary to support Nominet's core business then we might support a more narrowly drafted clause; Section 3.11 (Standards) should be adopted if modified to cover only "areas relating to the objects of the company"; Section 3.12 (Donations) is much too widely drawn and should not be adopted; if a case were made that these activities were necessary to support Nominet's core business then we might support a more narrowly drafted clause; Section 3.13 (Subsidiaries and Third Parties) is acceptable if considered necessary by the company.

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