

This is Arrowhead Systems Ltd response to the consultation on the scope of Nominet.

We would support option 3 with set limits on the scope and nature of the new areas of activity that would need further clarification.

We don't believe that the current outlook is as dire as Nominet would have us believe. However we would generally support bidding for ENUM and further registry services (not just UK based) as it would be inline with current UK registry operations.

We disagree with the carrot/stick tone of the document, of higher ENUM margins and a foot in the (overcrowded) Telephony market, with the stagnation and decline of the worlds number four registry. There could be higher margins than the two quid domain name but the market drives the prices, and I don't see why ENUM would be any different. There may also be operators economies of scale to be made in running combined registries, but a couple of percentage points on a two quid name is better than a couple of points on a reduced price 99p name, I do not believe that the current cost of a name is a deterrence to purchase, but rather the availability of good names.

Expanding into other Internet registry services is also in line with current activities, however the phrase 'wider Internet registry, database and security services' is far too broad. Take in to account 'research & development services (including open source software), and it could be argued that this allows Nominet to be in competition with database (the software solution) vendors as well as database (registry) operations and any number of firewall/anti-virus/anti-spam vendors! However it may mean that Nominet want to offer PKI and digital certificates and identity services that would be broadly inline with current operations. We would agree with that, but it doesn't say that's what they want to do.

Nominet should stay out of Domain Resolution and leave that to other parties, the rise in generic domain disputes and the 'case law' type of findings that the appointed experts seem to be creating could tarnish the Nominet's reputation, for protecting ALL stakeholders interests.

Nominet being able to 'offer consultancy services' is too broad a statement. Widening 'Nominet's ability to perform a regulatory role', declines to inform of the areas in which they would regulate. On charitable donations, one mans charity is another's peerage. I don't disagree with donations, but you must consult on the recipients unless it is under a pre-defined sum.

Too sum up our thoughts, we don't think we have been given a realistic choice.

Option 1 do nothing. Which I think most agree is not an option.
Option 2 do what we are doing and ENUM which is too restrictive.
Option 3 do virtually everything we could think of.
Option 4 do Option 3 and the things we couldn't think of.

We hope to see further modifications of the options before they are put to the vote again, and that the vote is separate from any other issue.

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