

BCS, The Chartered Institute for IT Consultation Response to:

**New .uk domain name service
Dated: 2 January 2013**

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BCS, The Chartered Institute for IT

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New .uk domain name service Closing date: 7th January 2013

Response to questions on the Report:

http://www.nominet.org.uk/sites/default/files/Nominet_FINAL_electronic_form3_0.pdf

G. Security

1a. As outlined above, we are proposing that the direct.uk service offers routine monitoring and notification to registrants of viruses and malware on sites associated with the domain. Do you have any comments on this proposal?

The Institute is in support of measures that potentially enhance online security and trust. Clarity is needed as to the types of monitoring provided along with the frequency and quality of updates. There are some concerns over demand for such services and pressure which may be placed on UK businesses, who may feel obliged to 'upgrade'. There will likely be a loss of confidence in the .co.uk extension, where it is expected to operate alongside the new .uk service.

1b. How long should registrants have to resolve any notified infection before their domain is suspended?

An allowance of 48 hours should be sufficient for registrants to take action and avoid suspension, which could be highly disruptive for UK businesses. Domains which continue to be affected after this period could expect suspension so as to uphold confidence in the .uk domain space.

2. As outlined above, we are proposing that the direct .uk service offers a trustmark to registrants. Do you have any comments on this proposal?

We believe that efforts should be made to ensure consumers are aware of enhanced services so as to guarantee greater confidence and minimise any uncertainty. A trustmark could be used to benefit small, lesser-known retailers. Brand credibility would likely be enough reassurance elsewhere. Could DNSSEC use also be made visible to users?

3. As outlined above, we are proposing that the direct .uk service requires a digital signature known as DNSSEC as mandatory. Do you have any comments on this proposal?

Service subscribers should be made aware of the scope and technical capabilities of what this offers. This would provide some assurances to users, but not all domains will require this level of security.

H. Verification of registrant contact data

4. As outlined above, we are proposing that a new direct .uk service requires registrants to provide contact information in the United Kingdom, such as a physical location or business presence. Do you have any comments on this proposal?

The Institute would support this as a means to provide a higher level of trust for users. There is some concern as to the method of contact confirmation and its reliability. Validation by a PIN code sent to a UK postal address would appear to be the most acceptable method but would need monitoring during the initial stages of implementation so as to ensure its integrity.

We recognise however, that this method is not infallible and could be breached.

5a As outlined above, we are proposing that registrant contact data undergoes verification as part of the registration process, prior to the domain name being 'activated'. Do you have any comments on this proposal?

This could be considered essential, though the verification process should be handled swiftly so as to minimise reasonable delays to activation.

We would welcome clarification about how the data will be verified and against what criteria.

5b. What is the maximum amount of time that a domain name should remain reserved for a registrant to enable activation by the PIN?

We believe that 14 days should be sufficient. Has the possibility of an appeals panel been considered in the event of a legitimate reason for delay i.e. technical or legal?

5c. As .uk domain names can be registered for between 1 and 10 years, how often do you think registrants should be required to validate their contact details by going through the authentication process outlined above?

The Institute believes that validation should occur on a rolling basis, no less than once within a two year period.

I. Third level sub-domains

6. Do you agree with the prevention of sale of sub-domains to third parties?

The Institute supports the prevention of sale of sub-domains to third parties. However, perhaps it could be considered if they were to be subject to the same verification processes.

J. Reserved and protected names

7a. Should a new direct.uk service follow the existing rules as outlined above or should it be more restrictive so that certain names or character combinations are not made available for registration?

No, there should be more restrictions

7b. If you believe that there should be restrictions, what names should be protected or reserved?

Sensitive names as designated by Companies House

Other generic or country code Top Level Domains

UK cities, towns or villages

Public authority names

Post codes

Indications of Geographic Origin

Single Characters

Generic terms

The Institute considers that reliance on Companies House to be unfair as not all companies are registered as Limited Companies. Please also see the comments below.

K. Phased Release and Rights Management

8a. Do you agree that a new direct.uk service should adopt a phased release of domain names with the hierarchy outlined above i.e. Registered Rights, Unregistered Rights, Landrush, General Availability?

The Institute believes that a phased release would be advisable but there are some concerns as to the approach; see 'further comments'.

8b. Do you agree that Nominet should operate a similar rights protections mechanism for re-registration of domains that have expired?

Yes

8c. Should we operate a mechanism for rights-holders to register interest in a domain name that is currently registered, so that they are notified if the domain is due to expire?

Yes

8d. Should the details of applicants in the sunrise process be made public or not?

The Institute believes that details of applicants in the sunrise process should be made public.

Further comments:

With trademark holders given priority, current domains would not be guaranteed a corresponding .uk format. This could cause both damage and confusion, especially where branding costs are concerned. Giving existing domain owner's priority would ensure consistency and thus instil greater confidence. Many UK businesses

have no registered copyright and Companies House would perhaps be better reference point. Allowing applicants to bid for a domain could put SMEs at a disadvantage and create additional costs for UK businesses. Deciding competing claims on the basis of longevity is an option.

L. Channel to Market

9. Do you agree that the sale of a new direct.uk service should be made only through registrars who can meet a certain level of service and verification of data quality?

Yes

If you agree, what criteria do you think registrars should commit to or comply with as part of the delivery of this new service?

The Institute believes that registrars should comply with DNSSEC standards, which are based on current best practice.

M. Existing Second Level Domains (SLDs)

10a. Nominet is fully committed to continue supporting the existing SLDs such as co.uk that we manage, as well as those managed by third parties. Do you have any comments on this approach?

The Institute believes that this could result in duplicates in order to protect brands and therefore result in confusion, where .uk and .co.uk operate alongside each other. An enhanced .uk domain would assumedly devalue .co.uk domain names and lower confidence in their usage. Businesses stand to lose out and may feel pressured into accepting a new .uk domain where added security features and technical services are not necessarily needed.

10b. Please tell us if you hold a domain name in one of the existing second levels in .uk (e.g. .co.uk)

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N. General views on the proposed service

11a. Do you agree that Nominet should consider the provision of a .uk domain name service with enhanced security and registrations directly at the second level?

Yes

11b. Are there any other points you would like to raise in relation to this consultation or about the proposed new service?

What happens should Scotland vote for independence in 2014? A more precise system could make use of .eng, .sco, .wal, or .nrl extensions but would likely cause problems where organisations exist in more than one of these locations. The Institute would welcome clarification.

11c. Are there any features that have been outlined in this consultation that you believe should be introduced into .co.uk over time?

Introduce checks as to the right of an applicant to register as a commercial entity (for .co.uk), or a non-commercial entity (for .org.uk).

End
