.UK modernisation, standardisation and legacy service retirement

1. Introduction

When Nominet was founded in 1996, it established the technical systems for the .UK platform which enable Registrars, and later Registrants, to administer .UK domains. The code base which supports the .UK registry platform is predominantly bespoke and has, like other registries, evolved over time.

In the meantime, Extensible Provisioning Protocol (EPP) has been introduced and Nominet has developed its own registry platform that uses standard EPP to support gTLD and ccTLD clients. This means we are now operating two different code bases, giving us and our customers the opportunity to identify what works well and what could be improved.

The .UK platform requires development and modernisation; this presents an opportunity to align with global domain industry standards where appropriate, improve the customer experience for Registrars and Registrants, improve security and deliver efficiencies. This will require us to retire some of the systems Registrars are familiar with, which we recognise will be a significant change.

During 2022, we shared our initial thinking with the .UK Registry Advisory Council (UKRAC) and Registrars in a product discussion paper and virtual roundtable. We refined the proposals and presented these at the Members' Conference in March 2023. A summary of these discussions is available on Registrar Resources. We have taken the feedback gathered onboard and further refined our proposals, which are presented in this consultation.

We are asking for your views on our proposals to significantly overhaul the .UK registry platform. This consultation sets out the proposed changes, the rationale for the changes, and seeks feedback on the impact on Registrars and Registrants.

We acknowledge that the proposed changes are significant. If we proceed as outlined, all Registrars will be required to make some changes to the way they manage .UK domain names. We have developed these proposals to minimise the impact on Registrars who exclusively use Web Domain Manager, while enabling those utilising EPP to use standard EPP. We want to understand more about the impact this will have so we can identify ways to support our customers as we transition to new systems and new ways of working.

If the changes outlined go ahead, we will give considerable advance notice to Registrars to allow for necessary development activities. In this document, some

changes have a proposed change date. Where dates are not provided, a full plan will be developed in collaboration with Registrars. We also want to understand whether there are other ways we can minimise the impact on Registrars. Your feedback is invited on how much notice is required, options for mitigating impact, as well as the details within the proposals.

The consultation period will run for three months until 26 April 2024. Alongside submitting a written response there are a variety of opportunities for stakeholders to find out more about the proposals:

- 20 February, 13.00 – 16.00, Consultation Overview, In person and virtual, London
- 11 March, 10.00 – 12.00, Webinar: Inter-Registrar Transfer Process
- 26 March, 13.00 – 15.00, Webinar: .UK Lifecycle
- 18 April, 10.00 – 11.30, Virtual drop-in for Q&A
- 24 April, 13.30 – 15.00, Virtual drop-in for Q&A and CEO call

You can use the online form to provide written input on the proposals. You can save your progress and return to complete it later. If you have any questions or queries regarding this consultation please contact modernisation@nominet.uk.

The deadline for submitting responses is 17.30 UTC +1 on 26 April 2024. Once the consultation closes, we will publish a feedback summary on Registrar Resources. Direct quotes from responses may be reproduced in a summary, but will not be attributed to any person or organisation.

We respect your privacy and are committed to protecting your personal data. Details will be processed in accordance with Nominet's privacy policy.

We are using SmartSurvey to manage our consultation responses. By filling out a survey or visiting this site, you agree to their Privacy Policy & Notice.

2. About you

Questions	1. Name 2. Company Name 3. Email 4. Are you a a. Registrar? Yes /No i. Do you integrate with the .UK WHOIS2? Yes/No ii. Do you integrate with the .UK DAC? Yes/No

	iii. Do you integrate with .UK EPP? Yes/No 1. Do you use your own software to integrate? Yes/No. a. What language is your software written in? 2. Do you use third party supplied software to integrate? Yes/No. If so what software? _____ 3. Do you use third party supplied service to integrate? Yes/No. If so what service? _____ b. Registrant? Yes /No c. Nominet member? Yes /No d. Other? _____ 5. If we have questions related to your feedback, may we contact you directly? Yes/No

3. Background and Summary

The domain name industry is always evolving and .UK is at an inflection point. While the existing legacy platform supporting the .UK registry is powerful and secure, it has an aging code base which requires modernisation to manage costs, deliver operational efficiencies and improve service to customers.

The .UK code base has evolved since Nominet's inception in 1996, retaining aspects of compatibility back to the 'automaton'. We currently operate two different EPP code bases: .UK written in C++, and our more modern Registry Services Provider (RSP) Platform EPP (used for .cymru, .wales and customer TLDs) written in Java, which more closely conforms to RFC standards for EPP.

Unlike our RSP Platform, the .UK code base is not database agnostic, which means it is closely tied to our underlying database technology, which is licensed on a per core basis. We estimate that the generation of hardware we will be operating by 2027 will be a tipping point in ongoing database licensing costs.

To inform our thinking on how best to modernise and simplify our .UK platform, we considered feedback on our current systems and published proposals in 2022 for consideration. This helped us identify what .UK Registrars and their customers need from a registry platform, now and in the future. We have also taken the opportunity to question why we do things the way we do today and review our business processes.

In considering the needs of Registrants and Registrars, we are particularly focused on how we can enable:

- Registrars to provide greater support to their customers (Registrants). Nominet's systems and processes should generally be either oversight to protect the internet users or customers from bad actor Registrars/ Registrants, or functional to support good actor Registrars/Registrants.
- Processes to be more easily understood by Registrars and Registrants; especially where someone might have multiple domains registered in different top-level domains. Differences should only exist where they add value.

The proposals made in the consultation are the most extensive set of product changes for the .UK registry since Nominet was founded. We are proposing to operate a single configurable registry services platform for .UK, .CYMRU, .WALES and other client ccTLDs and gTLDs, using our RSP platform as the basis for our new .UK codebase. The platform would utilise an IETF defined industry standard approach, while retaining the elements of .UK that add value. To support an updated implementation, new or updated policies will be required. The proposed policies are included in the consultation, and we welcome your views on these in your response.

A BRIEF TIMELINE AND HISTORY.

1982: WHOIS protocol defined.
1985: .UK was first registered on the 24th July.
1996: Nominet launched utilising our PGP email based 'Automaton'.
2003: Nominet altered the .UK Registry lifecycle from auto-renew to auto-delete on expiry.
2004: The wider industry standardised first versions of EPP in RFCs including auto-renew lifecycle.
2005: Nominet launched a 'WHOIS2' service to enable Registrars to offer their own WHOIS lookups on their own website.
2008: Nominet launched 'Nominet EPP' and Web Domain Manager.
2009: The wider industry refined and updated EPP RFCs.
2012: Nominet revised 'Nominet EPP' moving towards but stopping short of the 2009 EPP standards including variable registration periods.
2012: Wider industry started work on the Registration Data Access Protocol (RDAP) standard.
2014: Nominet launched .CYMRU and .WALES on a new industry standard EPP platform which has since supported other gTLD and ccTLD registries with varying business processes.
2014: ICANN appointed Nominet as an Emergency Backend Registry Operator (EBERO) for gTLDs using our standard EPP platform.
2015: Nominet's 'Automaton' was withdrawn as a method of domain management in .UK; update notifications and error messages today continue to relate to the automaton.
2016: Nominet took over the backend registry operations for MMX and .blog.
2017: Nominet carried out the first ever EBERO (.wed) for ICANN.

2019: ICANN required gTLDs to implement the RDAP standard.
2021: Nominet introduced status fields from the EPP standards to .UK.
2022: Nominet revised our expiring domains process for .UK and introduced some concepts from EPP RFCs.
2023: ICANN amended the gTLD Registry Agreement to sunset WHOIS and mandate RDAP for all gTLDs from January 2025.
2023: Nominet carried out the second ever EBERO (.desi) for ICANN.
2023: Nominet won the first public tender* to operate the .gov.uk registry which will be transitioning to our Registry Services Platform in 2024.
2024: Consultation on changes to .UK.

* In 2023, the Central Digital and Data Office (CDDO), part of the UK Cabinet Office, tendered for a registry service provider to take over the operation of gov.uk. The requirements include operating industry standard EPP. To qualify, bidders were required to already operate registries for third parties to ensure they kept up with global industry registry standards development and that the .gov.uk SLD could benefit from continuous improvements to the supplier's registry platform.

4. Legacy Technology

In this section, we identify the legacy technologies that could either be retired or replaced with more modern alternatives, which have additional benefits:

1. WHOIS (Port 43)
2. WHOIS2
3. Domain Availability Checker (DAC)
4. Check Command Restrictions
5. Miscellaneous APIs in .UK
    a. Searchable WHOIS API
    b. LIST API
    c. Domain Health API

1. WHOIS (PORT 43)

The WHOIS protocol was defined in 1982 and has served the internet industry well, providing access to the registry data for domain names and IP addresses. WHOIS has been the primary method of Registration Data Discovery Services (RDDS) for top-level domains until recent years.

WHOIS has well documented limitations, such as those listed by ICANN:

- No standardised format
- Lack of support for internationalisation
- Inability to authenticate users
- Lookup-only abilities and no search support
- Lack of standardised redirection or reference

- No standardised way of knowing what server to query
- Inability to authenticate the server or encrypt data between the server and client and therefore inherently insecure

ICANN mitigated the issues on standard format in gTLDs by requiring standard format output but .UK, like many other ccTLDs, has never followed suit.

The Internet Engineering Task Force (IETF) has defined STD95, which includes the individual RFCs that contribute components to the modern, secure, replacement for WHOIS, the Registration Data Access Protocol (RDAP). RDAP is a modern JSON based API utilising HTTP security standards.

ICANN has now amended the contracts of gTLD registries to require the support of RDAP across all gTLDs and allow port 43 WHOIS to be turned off by Registry Operators for gTLDs after 28th January 2025.

Nominet currently operates both a port 43 WHOIS service for .UK as well as an RDAP service. The RDAP service is machine readable and enables additional information to be added to its response without breaking third party usage. The move to RDAP as the default query tool for registries globally is a matter of when, not if.

We believe there is significant benefit in replacing WHOIS with the modern RDAP protocol from a security and interoperability perspective, and that there is a wider benefit in driving that change in usage and adoption.

There is a synergy in aligning the retirement of .UK WHOIS with the ICANN approved sunset date of Wednesday 29th January 2025 for gTLD WHOIS, given there will be considerable industry education in advance ensuring widespread awareness.

Proposal 1	RDAP is already deployed for .UK and we propose to retire port 43 WHOIS for .UK on Wednesday 29th January 2025 aligned to ICANN's WHOIS sunset authorisations for gTLDs.
Questions	6. Do you support Proposal 1? Yes/Mostly/No/I do not have an opinion. a. If 'mostly' or 'no', please explain why. 7. Do you have any additional comments on Proposal 1? Please include any details of how we can minimise any negative impact of this change and maximise any benefit. 8. Do you have any additional feature requests we should consider in the future for our RDAP service?

2. WHOIS2

WHOIS2 is a Nominet defined adaptation of the port 43 WHOIS protocol operating on port 1043. It allows third party web WHOIS clients to pass through the IP address of the requestor to enable their website to act as a gateway to Nominet's port 43 WHOIS.

The service was introduced in 2005. We are not aware of any other registries operating such a service, although many 'allow list' Registrar IP addresses on WHOIS lookups. In 2023, there were around 30 users of WHOIS2 and many of those users appear to be using it as an alternative to the Domain Availability Checker (DAC) which is not its defined or contractual purpose.

By contrast, the RDAP protocol utilises HTTPS as its delivery mechanism for lookups. Therefore, third party offered lookup tools can directly query from the user's browser to the Registry's authoritative servers. This means there is no need for an intermediary service when using RDAP for the purposes WHOIS2 was designed for.

Proposal 2	RDAP is already deployed for .UK, which can be utilised to provide the service WHOIS2 was designed for; we propose to retire WHOIS2 for .UK on Wednesday 29th January 2025 aligned to the proposed sunset of .UK WHOIS.
Questions	9. Do you support Proposal 2? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 10. Do you have any additional comments on Proposal 2? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

3. DOMAIN AVAILABILITY CHECKER (DAC)

Nominet's DAC for .UK was launched in 2005, pre-dating Nominet's deployment of EPP. It was designed to move availability query traffic for Registrars' public website availability checks from the WHOIS service to a lighter weight, real-time protocol. In 2009, the DAC was split into two versions, a real-time DAC and a time-delay DAC, due to the query volumes that emerged related to drop catching domains.

With the new Domain Expiry Process introduced in 2022, we now publish the drop time of all domains both in a list and via the 'EPP Check' command. The DAC is no longer a useful tool for drop catching. As a result, usage has dropped significantly. The DAC is still utilised for normal domain availability checks due to restrictions in EPP on using the check command.

As the change in drop process means specific restrictions are no longer required on EPP check commands, we intend to remove those restrictions and retire the DAC.

Proposal 3	We propose: a. To close new applications for access to the DAC from Monday, 3rd June 2024. b. To retire the .UK real-time DAC and time-delay DAC on Wednesday, 29th January 2025. a. Any subscription fees paid covering January 2025 or after will be refunded on a pro-rata basis for each calendar month.
Questions	11. Do you support Proposal 3? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 12. Do you have any additional comments on Proposal 3? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

4. CHECK COMMAND RESTRICTIONS

To prevent gaming, our previous domain name drop process forced us to place a restriction, specific to .UK, on using the EPP Check command as follows:

> *Use of check command*
> *In order to protect our systems, the check command is limited to a total of 5000 checks on domain names per day. To clarify, 100 domain name checks in a single request will count as 100 against the limit of 5000. The limit is measured from midnight to midnight. If the limit is exceeded, the check command is automatically disabled and will remain so until the following midnight.*

Since introducing the new Domain Expiry Process, which includes publishing the known drop time, we have seen a significant reduction in traffic hitting our servers to check for domain availability.

Proposal 4	We propose to remove the specific limitation on the usage of the check command in both EPP and Web Domain Manager on Tuesday, 4th June 2024 whilst retaining the rest of the Acceptable Use Policy for EPP and Web Domain Manager.
Questions	13. Do you currently use the EPP Check command in .UK? Yes/No 14. Do you support Proposal 4? Yes/Mostly/No/I do not have an opinion?

	a. If 'mostly' or 'no', please explain why. 15. Do you have any additional comments on Proposal 4? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

5. MISCELLANEOUS APIs IN .UK

.UK currently offers several APIs with very limited customer usage. Each of these APIs are bespoke to .UK and require ongoing maintenance. We are therefore considering retiring these APIs and replacing them with an extension of our RDAP Service.

a. Searchable WHOIS API

Note: this is distinct from Searchable WHOIS which is provided as a web-based user interface.

This API allows a searchable WHOIS subscriber to submit reverse WHOIS queries based on attributes and get back domain information.

In the wider industry, the IETF is at an advanced stage of defining how to carry out the equivalent of 'searchable WHOIS' using RDAP. The current version is published at 'Registration Data Access Protocol (RDAP) Reverse Search'.

Given we must upgrade the Searchable WHOIS API, and Registrars and others who need to carry out these searches are likely to need to interact with other registries, we are considering whether to instead align our approach and use a credentialled RDAP Reverse Search. This would reduce the technical overhead associated with maintaining a bespoke Nominet API integration.

Proposal 5	We propose to retire the Searchable WHOIS API and replace it with an equivalent credentialled Reverse Search RDAP at the point of transitioning .UK to the Nominet RSP platform.
Questions	16. Do you currently use the Searchable WHOIS API in .UK? Yes/No 17. Do you support Proposal 5? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 18. Do you have any additional comments on Proposal 5? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

b. List API

These APIs were developed to provide a functional replacement for a similar query offered by the now defunct automaton.

There are two APIs using different protocols, which are regarded as the LIST API:

a. LIST REST API
b. LIST SOAP API

These APIs allow users to submit a query for:

i. domains based:
    1. on dates (expiry/created) which returns a list of domains matching those parameters
    2. auto-bill setting
    3. nameservers
    4. locks
    5. contacts
ii. contacts matching a particular name or email which returns a list of contacts matching those parameters

We believe this is another case for aligning with Reverse Search RDAP with credentialled access.

Proposal 6	We propose to retire the LIST REST API and replace it with a credentialled Reverse Search RDAP equivalent.
Questions	19. Do you currently use the LIST REST API? Yes/No 20. Do you support Proposal 6? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 21. Do you have any additional comments on Proposal 6? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 7	We propose to retire the LIST SOAP API and replace it with a credentialled Reverse Search RDAP equivalent.
Questions	22. Do you currently use the LIST SOAP API? Yes/No 23. Do you support Proposal 7? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 24. Do you have any additional comments on Proposal 7? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

c. Domain Health API

Note: this is distinct from Domain Health as a service, which will be part of the future updated Web Domain Manager.

The domain health API is a REST API, which allows a Registrar to find a list of domains by TAG and associated domain health data.

We believe this is another case for aligning with Reverse Search RDAP with credentialled access.

Proposal 8	We propose to retire the Domain Health API and replace it with a credentialled Reverse Search RDAP equivalent.
Questions	25. Do you currently use the Domain Health API? Yes/No 26. Do you support Proposal 8? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 27. Do you have any additional comments on Proposal 8? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

5. .UK standardisation

Whether the decision is taken to utilise industry standard behaviours or retain existing bespoke .UK behaviours, there is considerable work required to maintain and modernise the .UK code base and manage future database software licensing costs. The feedback received to date on our proposals indicates the most efficient route would be to move .UK onto our more modern RSP platform, and then configure any bespoke behaviours we wish to retain for .UK.

The following sections set out the processes and policies we propose to change.

1. TAG/Accreditation types

Nominet's original 'Automaton' Registry introduced the terminology of an 'IPS Tag', which has in more recent years been referred to as a 'TAG' even after the move to an EPP based registry. A 'TAG' today is ultimately a Registrar's accreditation within the .UK top level domain and is utilised as the Client Login ID (CLID) for Registrars for EPP.

In 2014, .UK moved from having just one type of 'TAG' to having three levels of TAG functionality available in different 'Tag types' under an otherwise universal 'Registry-Registrar Agreement' for .UK

The TAG types available are:

- Accredited Channel Partner
- Channel Partner

- Self-Managed

In the case of Accredited Channel Partners and Channel Partners, the intent behind this distinction was to offer greater flexibility and functionality while allowing a Registrar to choose the level of responsibility they wished to accept. The self-managed TAG reflected that not all Registrars offer third party services and was designed to reduce the burden on Registrars who only manage domains on their own behalf.

In reviewing our implementation and the registry platform upgrades required, we question the relevance of technical or functional restrictions by TAG type. However, we do see the benefit of reduced requirements on Registrars where they are not providing services for third parties.

As we review our registry systems, we believe there are improved ways we can offer this flexibility whilst streamlining our systems and enabling Registrars to provide the very best service to Registrants.

The current 'Tag types' have the following requirements and benefits:

Customer Service		
Accredited Channel Partner	Channel Partner	Self-Managed
Maintain a website, accessible to the public that provides: • Address • Telephone number • Customer service commitments detailing expected response times and how long it usually takes to resolve issues • Email contact point for abuse complaints Acknowledge receipt of customer contacts or complaints within 3 working days Ensure your customers are aware of: • Charges for registration, renewal and maintenance • Any ongoing charges • Key terms of contract • Your policy on renewal and expiry of domain names	As per Accredited Channel Partner except acknowledgement of contacts or complaints is within 5 working days.	If services are provided to a third-party then as per Channel Partner. If service not provided to third parties not applicable.

Data Validation

Accredited Channel Partner	Channel Partner	Self-Managed
Where Nominet is not able to validate data the registrar will need to take action to amend the data or confirm the data is valid.	Where Nominet is not able to validate data Nominet will contact the registrant.	
Nominet utilises the 'Organisation' field of a contact object as the designated registrant name, where it does not exist it is inserted by Nominet's systems from the 'name' field.		
	Registrars are restricted from being able to amend the 'Organisation' field on a contact object.	

Functionality and Benefits		
Accredited Channel Partner	Channel Partner	Self-Managed
• On behalf of your customers, you may transfer domain names to a new registrant free of charge. • Ability to make corrections to Registrant name. • Ability to opt out of certain types of automated notifications that we currently send to your customers. • Functionality to delete domains suspended for poor data quality. • Ability to transfer expired domains with customers express permission. • Eligible to apply to operate a Proxy Service within the Nominet Proxy Service Framework.	• No additional requirements/ benefits.	• Domain Names must usually be registered only in the name of the Registrar. You may specify five registrant names at any one time which will be regarded as being your name. These must be linked to you in some way. • You may transfer domain names on a Self-Managed TAG to a new Registrant free of charge.

Marketing and Communications		
Accredited Channel Partner	Channel Partner	Self-Managed

• Eligibility to apply for on-going promotional activities and programmes. • Right to use the Accredited Channel Partner logo. • Identified as holding Accredited Channel Partner TAG on Nominet website(s).	Not Applicable. (Some promotional activities have been made available despite this.)

Restrictions		
Accredited channel Partner	Channel Partner	Self-Managed
• Multiple Accredited Channel Partner tags allowed.	• Multiple Channel Partner tags allowed.	• Only one Self-Managed TAG per Registrar.

Proposed new approach

We believe there would be significant benefit to Registrants and Registrars in removing the functional differences between TAG types and enabling the same functionality for all Registrars. We see no evidence in the marketplace of users choosing between 'Channel Partners' and 'Accredited Channel Partners' based on the minor differences in the Registry-Registrar Agreement. We therefore propose the following common benefits for all Registrars:

Customer Service

• Where a Registrar is providing domain services to:
  ○ only themselves
  ▪ there will be no customer service requirements.
  ○ third parties then:
  ▪ they must be able to demonstrate that through their normal course of business they make easily accessible to their customers, ideally via a public website:
  ▪ Their contact address, telephone and customer service commitments which detail expected response and resolution times.
  ▪ they must ensure customers are aware of:
  ▪ Charges for registration, renewal and maintenance on domains.
  ▪ Any ongoing charges.
  ▪ Key terms of contract.
  ▪ The policy on renewal and expiry of domain names.
  ▪ Acknowledge receipt of any customer contacts or complaints within 5 working days.

- Provide a contact point for abuse reporting for publication on RDAP.

Data Validation
• All Registrars will be required to provide complete and accurate data capable of being used to contact the Registrant.

Functionality and Benefits
• Change the Registrant of a domain free of charge (with the express consent of the Registrant). • Ability to make corrections to Registrant name. • Ability to opt out of certain types of automated notifications that we currently send to your customers. • Ability to delete domains subject to terms and conditions. • Eligible to apply to operate a Proxy Service within the Nominet Proxy Service Framework.

Marketing and Communications
• Eligibility to apply for on-going promotional activities and programmes. • Right to use a .UK Registrar logo. • Identified as a Registrar on Nominet website(s).

Restrictions
• Multiple Registrar accreditations allowed per legal entity.

In technical implementation terms this means that all Registrars will have the same technical functionality on our systems.

In making these changes, we propose to remove the following requirements (currently requirements for Accredited Channel Partners):

a. Relevant insurance for the type and scale of the business operated.
b. Provision of Business Continuity plans to Nominet except where the Registrar provides a privacy/proxy service.

All Registrars will be permitted to, with the explicit consent of the existing Registrant and the new Registrant, change the registrant of a domain name at any time.

Proposal 9	We propose adopting the new single set of benefits and requirements for all Registrars as set out in the consultation document, which would mean that all Registrars have the same functionality available to them.
Questions	28. Do you support Proposal 9? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 29. Do you have any additional comments on Proposal 9? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

Terminology

There are some aspects of terminology that have been developed for .UK which are referred to differently across the industry. We propose standardising the lexicon to reduce complexity for Registrars and Registrants.

- TAG

  Nominet's 'TAG' terminology relates directly to the original Automaton implementation. Today from an EPP implementation perspective, it acts as the industry standard Client Login ID (CLID) for the Registrars 'Accreditation'.

  The existing 'push' transfer process requires Registrants to inform their current Registrar of the TAG they wish their domain to be moved to for their new Registrar. It therefore remains more visible than it needs to be, potentially confusing users.

  Given the proposal to alter the transfer process to a 'pull' process, as set out in the Inter-Registrar Transfer Process section below, we propose ending the references to 'TAG' and instead referring to an 'Accreditation', which is more widely understood across the industry.

- Transfer

  Nominet has historically used the term 'transfer' to refer to both 'transferring' domains to a:

  - new Registrar; or
  - new Registrant

Across the .UK registry documentation and approach 'transfer' usually refers to a 'change of Registrant'.

The EPP RFCs define 'transfer' commands to act as part of the inter-registrar transfer process – this is the more commonly used terminology across the industry. It should however be noted that within ICANN discussions 'transfer of Registrant' does come up in discussions from time to time.

We propose updating the .UK lexicon so that:

- 'Change of Registrant' is used to mean a domain being updated from one Registrant to another.
- 'Transfer' is used in relation to the inter-registrar transfer process.

- Accredited Channel Partner / Channel Partner / Self-Managed

With the proposed changes to have one TAG or Accreditation type, we would move to refer to all Registrars entitled to register in .UK as 'Accredited Registrars'.

Proposal 10	We propose adopting an updated lexicon for .UK as part of these overall proposals as set out in the consultation document.
Questions	30. Do you support Proposal 10? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 31. Do you have any additional comments on Proposal 10? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

2. Inter-Registrar Transfer Process

The current .UK inter-registrar transfer process is not directly compatible with standard EPP.

Currently .UK operates a push process where either:

1. The existing Registrar must 'push' the domain to a new Registrar's TAG/accreditation; or
2. The Registrant must 'push' the domain to a new Registrar's TAG/Accreditation via Nominet's online services.

The gaining Registrar has the ability to configure whether they need to authorise accepting the domain.

If a Registrar accepts a domain onto their TAG/Accreditation, frequently they cannot match the incoming domain with an expected user in their system. This

means Registrants may not be subject to the Registrar's terms and conditions at the time of transfer, and the domain sits in-limbo at the Registrar until the Registrant identifies themselves by submitting the request to the new Registrar. While uncommon, a third party could intercept the domain in this scenario.

The alternative approach, used in the basic EPP standard, is a pull process, where the gaining Registrar must submit a transfer request alongside a transfer authorisation code. This is much like the process used in UK telecoms number transfers where the existing provider gives the customer a 'porting authorisation code' (PAC) and the new provider submits the PAC to request the telephone number. The security of this approach is greater as to submit the request, they must have obtained the data from a system user and thus on completion of the transfer can link it to the correct account.

The most common complaint with the pull transfer approach is speed – this is not an issue with the protocol requirements but with the implementation policy currently mandated by ICANN in gTLDs. ICANN allows for a 5-day period in which a losing Registrar can object to the transfer of a domain before the transfer is implemented. The ICANN community are currently revising this policy, having recognised that the 5-day period creates a negative customer experience.

The current .UK inter-registrar transfer process does not amend the expiry date of a domain and is done without cost, whereas the EPP standard can support a transfer with or without renewal. The usual implementation for gTLDs is to mandate a minimum of single year renewal on completion of transfer. The industry standard RFC5731 EPP Domain Name Mapping can support both approaches with a pull transfer mechanism.

In introducing transfer authorisation codes to the .UK Registry, we believe it is important to learn the security lessons of other operators and to require that all such codes meet a minimum level of security and have a maximum Time-To-Live (TTL) for authorisation codes. We therefore propose requiring compliance with RFC9154 for those using EPP. As many .UK Registrars do not utilise EPP but instead use Web Domain Manager, we propose that Web Domain Manager will also comply with RFC9154.

Proposal 11	We propose .UK will use the industry aligned 'Transfer Authorisation Code' pull transfer process defined in RFC5731 and this will be supported by both EPP and Web Domain Manager. Transfers will be instant on submission of a valid transfer authorisation code to the Registry. There will be no requirement for an annual increment to the expiry date at the time of transfer between Registrars and there will be

	no Registry renewal charge levied at the time of transfer except where a renewal is requested.
Questions	32. Do you support Proposal 11? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 33. Do you have any additional comments on Proposal 11? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 12	We propose mandating RFC9154: Secure Authorisation Information for Transfer. Whether a Registrar is using Web Domain Manager or EPP, we propose the registry will impose a maximum 15-days authorisation code TTL at the Registry level.
Questions	34. Do you support Proposal 12? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 35. Do you have any additional comments on Proposal 12? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 13	We propose the .UK Inter-registrar transfer policy will be as defined in 'Proposed Policy 1: .UK Inter-registrar transfer policy' as set out in the consultation document.
Questions	36. Do you support Proposal 13? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 37. Do you have any additional comments on Proposal 13? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

Proposed Policy 1: .UK Inter-registrar transfer policy

1. Policy version DRAFT-2024-01
2. This document sets out the inter-Registrar transfer policy for the .UK top level domain.
3. It is a fundamental policy principle for the registry that Registrants may choose from a competitive Registrar market to register or maintain their domains and must be able to move between Registrars accordingly.
4. Registrant request transfer authorisation code from losing Registrar.
    1. To transfer a domain between Registrars, a Registrant must ask the losing Registrar to:

1. Set and provide them with a Transfer Authorisation Code. Any request to set a new Transfer Authorisation Code will also be a request to expire any existing transfer authorisation codes.
2. Remove any Registrar set transfer locks on their domain before requesting the gaining Registrar to transfer the domain.

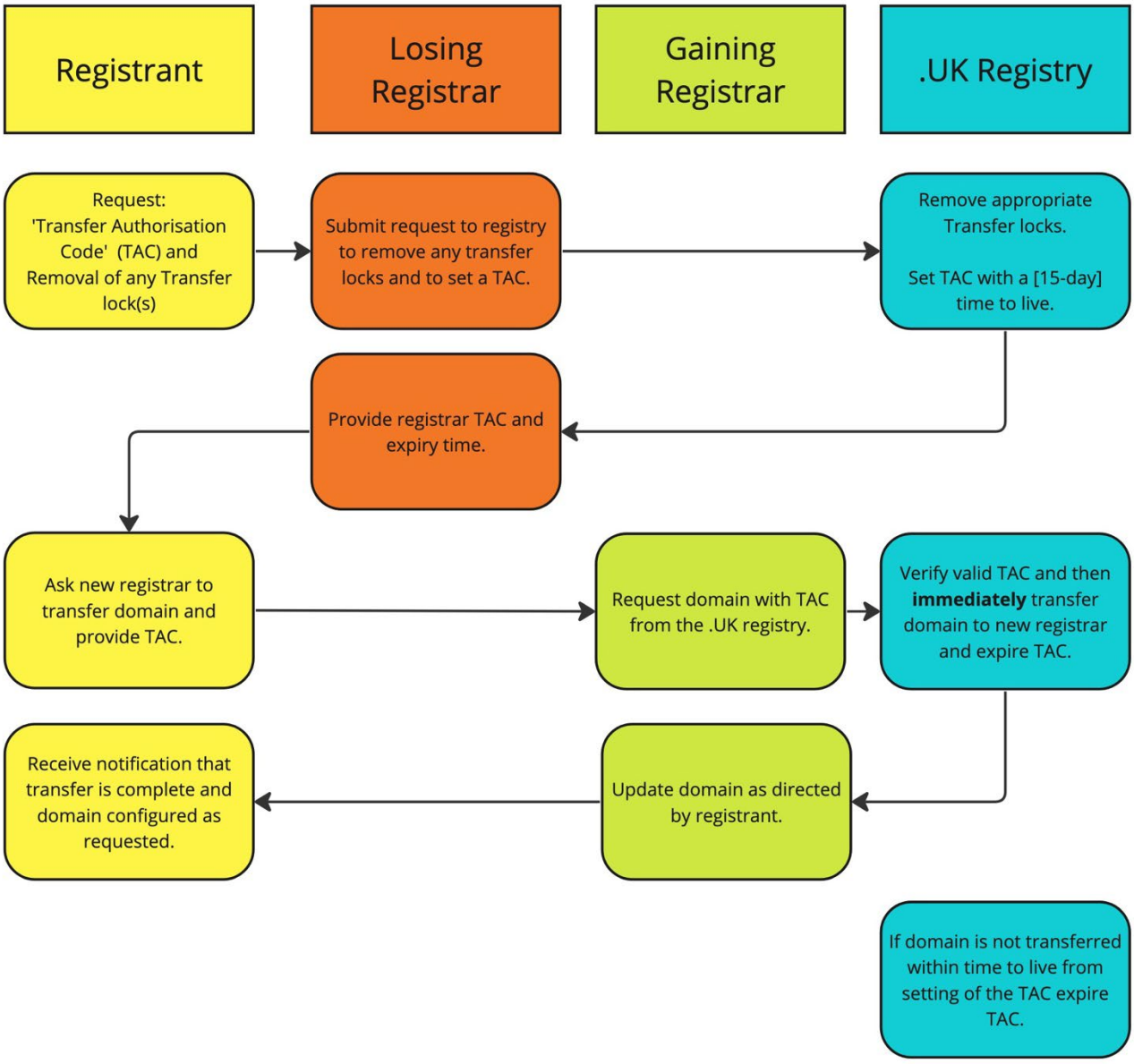
5. Losing Registrars must when asked to transfer a domain:
    1. Ensure the request is authentic from their Registrant.
    2. Remove any transfer locks that the Registrar has set on the domain at no charge within 5-days when asked to do so by the Registrant - unless the Registrar can show the lock is in place to prevent a case where they reasonably believe domain name abuse is taking place and/or to adhere to other registry policies.
        1. For the avoidance of doubt, a Registrar imposing a transfer lock without consent of the Registrant after create, update or transfer in of a domain or its associated objects where there is no other evidence of domain name abuse or breach of policy is not allowed.
    3. Set a Transfer Authorisation Code at the registry for the domain.
    4. Provide the Transfer Authorisation Code to the Registrant within 5-days at no charge.
    5. Retain records, which must be made available to Nominet's compliance team in a dispute or audit, pertaining to the provision of the Transfer Authorisation Code for 15 months including:
        1. Timestamp of Transfer Authorisation Code being set.
        2. Communication method of the Transfer Authorisation Code.
        3. Who the Transfer Authorisation Code was provided to.
6. The registry will set a Time To Live (TTL) on any Transfer Authorisation Code that is created. Only one Registrar set Transfer Authorisation Code may exist at a time on any one domain.
7. The Registrant:
    1. May request that the transfer is done:
        1. without renewal except if the domain is in the auto renew grace period; or
        2. With renewal of a period of 1-10 years except where that would result in an expiry date of more than 10 years in the future.
    2. Must:
        1. agree to the gaining Registrars' terms and conditions of service including binding to current registry policies and Registrant Terms and Conditions.

2. request the transfer of the domain by providing a valid Transfer Authorisation Code to the gaining Registrar.

8. The gaining Registrar must:
    a. bind the Registrant to their terms and conditions and the registry policies and Registrant Terms and Conditions and be able demonstrate this to Nominet's compliance team.
    b. submit a transfer request to the registry:
        a. including the Transfer Authorisation Code.
        b. only request a renewal with transfer if the Registrant has requested the renewal period.
        a. If the domain is in the auto renew grace period, the registrar must request a minimum of one year renewal for the transfer to be accepted.
9. The Registry will immediately upon receipt of a transfer request:
    1. Verify that:
        1. no locks exist on the domain to prevent transfer;
        2. the Transfer Authorisation Code for the domain is valid.
    2. Provided the verification in preceding step is OK, move the domain immediately to the new Registrar:
        1. If the Registrar did not request renewal, the domain will transfer with no charge from the Registry to the Registrar.
        2. If the Registrar requested a renewal the appropriate renewal term will be processed as part of the transfer.
        3. If the domain is in the auto renew grace period, the auto renewal will be cancelled resulting in only the renewal requested as part of the transfer request being charged.
        4. Expire the Transfer Authorisation Code from the domain.
10. The registry will if it has not received a transfer request in 15-days from the time the Transfer Authorisation Code was set, expire the Transfer Authorisation Code.
11. Complaints regarding inter-Registrar transfers
    1. A complaint may be made to Nominet by a Registrant against the losing Registrar if:
        1. the losing Registrar fails to remove a transfer lock and/or provide a Transfer Authorisation Code to a Registrant in accordance with this policy.
        2. The losing Registrar does not take reasonable steps to ensure the authenticity of a request to provide a Transfer Authorisation Code; and/or provides the Transfer Authorisation Code to an unauthorised third party.

2. A complaint may be made by the losing Registrar to Nominet as to the legitimacy of an inter-registrar transfer
    1. The losing Registrar may dispute an inter-registrar transfer which has completed on behalf of, and with the consent of, the Registrant by raising a complaint with Nominet.
3. The outcome of any compliance investigation into any complaint under this policy may result in the Registry:
    1. Upholding the status quo.
    2. Putting a domain into the state the Registrant intended.
    3. Suspending a Registrar's Accreditation for breach of policy.
    4. Terminating a Registrar's Registry-Registrar Agreement for breach of policy.

Diagram of proposed Inter-Registrar Transfer process.



6. .UK Lifecycle

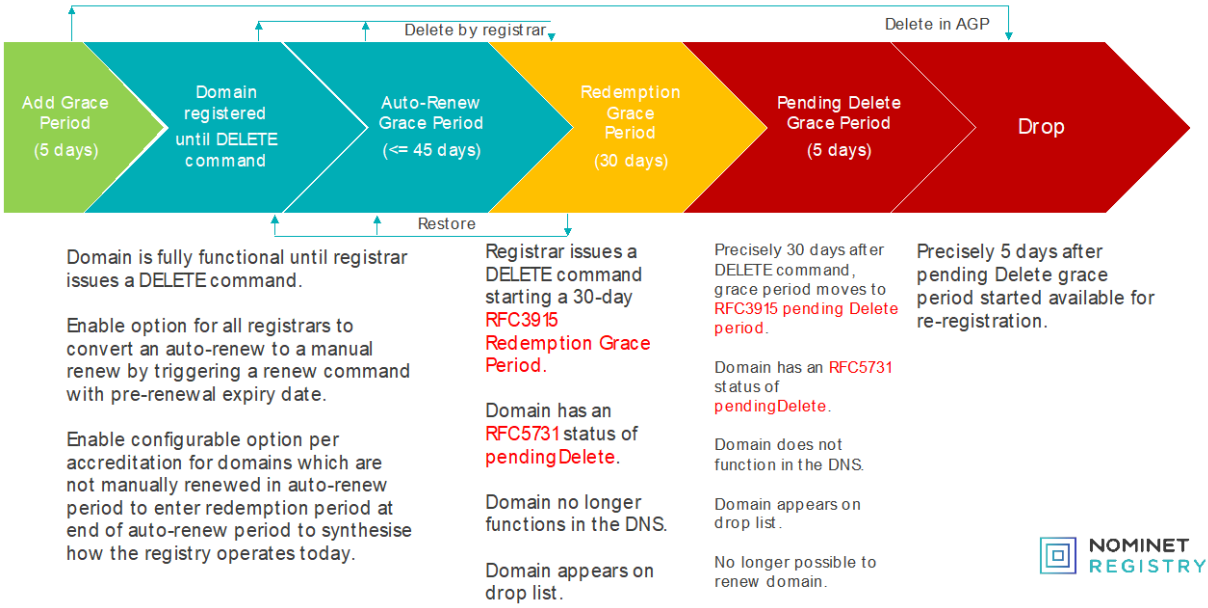
Until 2003, .UK operated an auto-renew lifecycle model where Registrars had to explicitly request to delete a domain in a specific time window otherwise it would auto-renew. This differed from the now industry standard registry auto-renew model, where deletes happen when the Registrant requests them and not at a point in relation to renewal.

In 2003, Nominet changed the renew lifecycle model to an auto delete model so that Registrars had to explicitly request to renew a domain name.

One concern some Registrars have in moving to the industry standard auto-renew model is managing the process of requesting domain deletion where a Registrar does not have automated infrastructure. This is the mirror concern of 2003 where Registrars were worried about having to issue renew commands. When Nominet changed the model in 2003, we introduced some additional measures to alleviate those concerns and we are proposing to do the same now.

We believe we can offer a model that achieves the best of both worlds by enabling Registrars to configure their Accreditation to either act in an auto-delete manner (as today) or an auto-renew manner – see the lifecycle policy below.

Proposed .UK lifecycle process



We propose that transactions will operate as follows:

- Will be charged to the Registrar's credit account at the start of each grace period

- Will only be invoiced after the completion of the grace period
- Domains which are unrenewed or deleted during renew, transfer or auto-renew period, will have the transactional charge released back to available credit
- Invoices will be consolidated and include all registration and renewal transactions for each month.

If this proposal goes ahead, Nominet will review all credit limits to ensure they are appropriate for an auto-renew model and:

- The auto-renew fee will be deducted from the available credit at the time of auto-renew even if it takes the Registrar past their existing credit limit. (i.e. a Registrar lacking available credit will not force the deletion of a domain at expiry)
- The amount only becomes payable and invoiced if the domain is not deleted before the end of the auto-renew period

Proposal 14	We propose introducing RFC3915 Domain Registry Grace Period mapping for EPP and the associated new lifecycle process as set out in the consultation document.
Questions	38. Do you support Proposal 14? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 39. Do you have any additional comments on Proposal 14? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 15	To support the new technical lifecycle, we propose adopting 'Proposed Policy 2: .UK Registry-Registrar Lifecycle policy' as set out in the consultation document.
Questions	40. Do you support Proposal 15? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 41. Do you have any additional comments on Proposal 15? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 16	We propose adopting 'Proposed Policy 3: .UK add grace period limits policy' as set out in the consultation document.
Questions	42. Do you support Proposal 16? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why.

	43. Do you have any additional comments on Proposal 16? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

Proposed Policy 2: .UK Registry-Registrar Lifecycle Policy

1. Policy version: DRAFT-2024-01
2. The registry operates a lifecycle with Registry Grace Periods as follows:

Grace Period	Registry settings
Add Grace Period (subject to add grace period limits policy)	5 days
Renew Grace Period	5 days
Transfer Grace Period	5 days
Transfer Lock on registration, transfer or change of registrant	No lock and no registrar-imposed lock allowed except with explicit consent of the registrant.
Auto-renew Grace Period	45 days
Redemption Grace Period	30 days
Pending Delete Grace Period	5 days

3. Notice to Registrants of Fees and Procedures
    a. Registrars must make their renewal fees reasonably available to Registrants and prospective Registrants at the time of registration of a domain.
        a. At a minimum, these fees must be clearly displayed on the Registrar's website and a link to these fees must be included in the Registrar's registration agreements. Registrars who do not offer or provide Registrar services through a website must at least include the fees in their registration agreements.
        b. Additionally, Registrars must ensure that these fees are displayed on their resellers' websites.
4. Domain cancellation
    a. If a Registrant wishes to cancel their domain, they may do so at any time subject to registry policies.
        1. To cancel a domain a Registrant must do so via their Registrar, requesting the deletion of their domain.
    b. Registrars must:
        1. Reject cancellation requests for any domains with a 'server delete prohibited' lock.

2. Process properly authorised domain cancellation requests from a registrant within 5 days by requesting the registry to 'delete' the domain.

c. The registry will:

1. Provided a domain is not subject to a delete prohibition place a deleted domain into the Redemption Period.
2. If the domain is not restored within the Redemption Period put the domain into a pending delete grace period.
3. At the end of the pending delete grace period purge the domain from the registry.

5. Expiration Reminder Notices

a. Registrars are required to notify Registrants of their expiry date at least as follows:

a. Approximately one month prior to expiry;
b. Approximately one week prior to expiry;
c. If not renewed by the Registrant with the Registrar before expiry at or within 5 days after expiry.
d. If a change of Registrant occurs at or after one month before expiry the new Registrant must be notified of the expiry date.
e. Registrars must describe the methods used to deliver pre- and post-expiration reminder notifications to Registrants.

a. If a Registrar offers registration and renewal via a website the information must be displayed there.
b. This description should generally include communications channels/media that will be used and identification of the point of contact to which the notices will be transmitted (e.g., email to Registrant, telephone call to administrative contact, postal mail to customer, etc.).
c. Registrars' registration agreements must include either a similar description of its notification methods or a link to the applicable page(s) on its website where this information is available.
d. Additionally, Registrars must ensure that these communication methods are described on their resellers' websites.

6. Renewals

a. A Registrar must not renew a domain without the explicit consent of a Registrant. A Registrar is offered, by the registry, the benefit of the auto-renew grace period to receive that consent.

b. Failure by the Registrant to consent to the renewal of a domain, shall in the absence of extenuating circumstances, result in the deletion of the domain by the end of the auto-renew grace period by the Registrar (although the Registrar may choose to delete the name earlier).

c. Extenuating circumstances are defined as:

    a. Dispute service action

    b. Valid court order

    c. failure of a Registrar's renewal process (which does not include failure of a Registrant to respond),

    d. the domain is used by a nameserver that provides DNS service to third-parties (additional time may be required to migrate the records managed by the nameserver),

    e. the Registrant is subject to bankruptcy proceedings, payment dispute (where a Registrant claims to have paid for a renewal, or a discrepancy in the amount paid), billing dispute (where a Registrant disputes the amount on a bill),

    f. domain subject to litigation in a court of competent jurisdiction

    g. other circumstance as approved specifically by Nominet.

d. Where the Registrar chooses, under extenuating circumstances, to renew a domain without the explicit consent of the Registrant, the Registrar must maintain a record of the extenuating circumstances associated with renewing that specific domain for inspection by Nominet.

e. In the absence of consent to renew by the Registrant or extenuating circumstances, a Registrar must request deletion of a domain within the auto-renew period.

    a. A Registrar may achieve compliance with this requirement by configuring their accreditation at the registry to auto-delete at the end of the auto-renew period and triggering manual renewals for all renewed domains.

f. Registrars are not required by registry policy to interrupt the DNS resolution path during the auto-renew grace period of an expired domain. However, if the Registrar directs web traffic to the domain to a web page while the domain is still renewable by the Registrant, that web page must conspicuously indicate that the domain is expired and provide renewal instructions.

g. Registrars shall provide notice to each new Registrant describing the details of their deletion and auto-renewal policy including the expected time, at which a non-renewed domain would be deleted relative to the domains expiration date, or a date range not to

exceed ten (10) days in length. If a Registrar makes any material changes to its deletion policy during the period of the registration agreement, it must make at least the same effort to inform the Registrant of the changes as it would to inform the Registrant of other material changes to the registration agreement.

h. If the Registrar operates a website for domain registration or renewal, details of the Registrar's deletion and auto-renewal policies must be clearly displayed on the website.

i. Beginning at the time of expiration and through to the end of the Redemption Grace Period the Registrant at the time of expiration must be permitted by the Registrar to renew the expired domain.

7. Renew Grace Period
   a. Only one Renew Grace Period can apply to a domain.
   b. Domains in Renew Grace Period can be renewed but in doing so that confirms the acceptance of the early end of any existing Renew Grace Period.
   c. A registrar may un-renew a domain during the Renew Grace Period.
      1. In the event an un-renew returns the domain to an expiry timestamp in the past, the domain will be treated as having entered the Auto-Renew Grace period at the expiry timestamp as if it had never had a Renew Grace Period.
8. Redemption Grace Period
   a. The registry offers a Redemption Grace Period immediately following the deletion request of a domain, during which time the deleted domain may be restored at the request of the Registrant by the Registrar that deleted it. Domains deleted during the registry add-grace period are not subject to the Redemption Grace Period.
   b. During the Redemption Grace Period, the registry disables DNS resolution and prohibits updates. The registry will also clearly indicate in its Registration Data Directory Service result for the domain that it is in its Redemption Grace Period.
   c. Registrars must permit the Registrant to restore a deleted domain during Redemption Grace Period for no additional charge other any outstanding renewal fees.
      a. The registry restore fee will be zero pounds (GBP 0).
9. Impact of disputes. If a domain which is the subject of a Registration dispute is deleted or expires during the Registration dispute, the complainant in the dispute will have the option to renew or restore the domain under the same commercial terms as the Registrant. If the complainant renews or restores the domain, the domain will be placed in clientHold and clientTransferProhibited status, the RDDS contact information for the Registrant will be removed, and the RDDS contact entry will indicate that the domain is subject to dispute. If the

complaint is terminated, or the dispute finds against the complainant, the domain must be deleted within 45 days. The Registrant retains the right under the existing Redemption Grace Period provisions to recover the domain at any time during the Redemption Grace Period and retains the right to renew the domain before it is deleted.

Proposed Policy 3: .UK add grace period limits policy

1. Policy version: DRAFT-2024-01
2. The Add Grace Period (AGP) shall be restricted as:
    1. During any given month, Nominet shall not offer any refund to a Registrar for any domains deleted during the AGP that exceed:
        1. 10% of that Registrar's net new registrations (calculated as the total number of net adds of one-year through ten-year registrations, or
        2. fifty (50) domains, whichever is greater, unless an exemption has been granted by Nominet.
3. A Registrar may seek an exemption from Nominet from the application of such restrictions in a specific month, upon demonstrating:
    1. extraordinary circumstances;
        1. For any Registrar requesting such an exemption, the Registrar must confirm in writing to Nominet how, at the time the domains were deleted, these extraordinary circumstances were unknown, reasonably could not have been known, and were outside the Registrar's control. Acceptance of any exemption will be at the sole and reasonable discretion of the Nominet. However, "extraordinary circumstances" which reoccur regularly for the same Registrar will not be deemed extraordinary.
    2. evidence the domain(s) were being used to commit DNS Abuse or were fraudulent registrations.
        1. For any Registrar requesting such an exemption, the Registrar must confirm in writing to Nominet full details of the DNS abuse or fraudulent registrations.

Technical changes to support the proposed change

Existing per domain fields related to renewal

In moving to an auto-renew lifecycle model, we intend to retire the following registry fields:

- Next-bill: this field is used by a very small number of Registrars and is used to trigger auto-renew behaviour mostly up to a week before expiry.

- Auto-bill: this field is used by more Registrars, but is generally used to trigger auto-renew behaviour mostly the day before expiry.
- Renew-not-required: the changes proposed to the lifecycle would replace this with the usage delete command (or auto-delete at the end of the auto-renew period).

These fields were introduced when Nominet moved to an auto-delete lifecycle and we believe the new lifecycle eliminates the need for these fields as they are used today.

Use of Delete command, Redemption Period and Restoring Domains.

Our proposal to enable Registrants to request the deletion of their domain via their Registrar was well received by the majority of those that have fed back. To enable this, we propose implementing RFC3915 which introduces the concepts of redemption period and restoring domains which are in a redemption period, conforming to the IETF agreed standards requirements. However, some Registrars have raised concerns around the technical processes for restoring a domain which happens in two stages through EPP:

1. The sending of a restore request.
2. The sending of a restore report.

Only once both stages are complete is a domain restored from the redemption Period.

The process defined in the RFC is deliberately two stages to collect information related to the details of the restoration and to confirm that the Registrar is not restoring the domain to take over the domain themselves.

For the vast majority of Registrars who utilise Web Domain Manager as their primary tool to manage their domains, they will simply need to follow a form-based process flow on both stages as if it were one; and for those Registrars who wish to use standard EPP, we believe it would be more beneficial to follow the IETF defined standards.

Notifications from Nominet to Registrants.

In .UK today, Nominet notifies Registrants by email when their domain:

1. expires.
2. 7 days before a domain is suspended and enters into a pending delete status with a redemption period.
3. is suspended for non-renewal and enters pending delete status with a redemption period.
4. 7 days before a domain ceases to be renewable.
5. is purged from the registry.

With a proposed new operational approach encouraging a stronger relationship between Registrants and Registrars, we propose to stop sending direct automated messaging as part of the domain lifecycle to Registrants. Our rationale is as follows:

1. Domains will no longer expire at the Registry but instead be auto-renewed, leaving a grace period for the Registrar to delete the domain. Therefore, we do not believe a notification of expiry is relevant and it is not possible to send a notification 7 days before a Registrar informs us to delete a domain.
2. Domains will still be suspended and enter pending delete status but this will be when a registrar sends a 'delete' command. All registrars are still required to remind Registrants of their need to renew their domain and we believe Nominet should focus on dealing with any failures of Registrar compliance rather than blanket messaging Registrants who seek to delete their domains.
3. The equivalent of 7 days before it ceases to be renewable would be 7 days before the end of the redemption period. A domain has only entered the redemption period based on strict policy rules and a request from the Registrar to delete the domain, we do not believe this warrants a reminder under the new process.
4. By the time a domain is purged from the Registry, it is too late to take any action. Therefore, we believe there is little benefit to continuing these notifications.

Proposal 17	We propose that under the new operational model, Nominet will no longer send an email to a Registrant at expiry reminding them to renew the domain.
Questions	44. Do you support Proposal 17? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 45. Do you have any additional comments on Proposal 17? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 18	Under the new operational model, Nominet will no longer be able to determine when 7 days before suspension is and therefore we will no longer notify Registrants.
Questions	46. Do you support Proposal 18? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 47. Do you have any additional comments on Proposal 18? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

Proposal 19	We propose that under the new operational model, Nominet will no longer send an email to a Registrant when a domain enters Pending Delete status.
Questions	48. Do you support Proposal 19? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 49. Do you have any additional comments on Proposal 19? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 20	We propose that under the new operational model, Nominet will no longer send an email to a Registrant 7 days before a domain ceases to be restorable.
Questions	50. Do you support Proposal 20? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 51. Do you have any additional comments on Proposal 20? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 21	We propose that under the new operational model, Nominet will no longer send an email to a Registrant when a domain is purged.
Questions	52. Do you support Proposal 21? Yes/Mostly/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 53. Do you have any additional comments on Proposal 21? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

7. Investigation Lock

Nominet's Registrar 'Investigation lock' is intended to be used on registrations that are being investigated for abuse. The lock on newly registered domains is limited to 5 or 5% of new creates for that Registrar. This has its basis in early versions of Investigation Lock, which resulted in domain deletion after a period and was therefore limited to prevent Registrars using it as an alternative means of deleting domains beyond the defined limits. Deletion does not happen automatically in the current version and the lock only sets EPP 'server' statuses.

- The lock was first introduced in 2009 as the 'phishing lock' and replaced in 2010 as an 'investigation lock'.
- It was implemented using Nominet's bespoke EPP and not EPP client statuses.

- In 2021 we introduced EPP client statuses to .UK because we could identify a number of Registrars attempting to deal with abuse using this approach.

Investigation lock vs client statuses

We recognise that Registrars deal with abuse across many top-level domains and differences in the technical implementation can add complexity. Registrars can use EPP client statuses to deal with abuse instead of the investigation lock, Nominet explicitly permits this. The only difference is that client statuses do not prohibit the Registrant transferring the domain via a paid transfer in Nominet online services. Elsewhere in these proposals, we propose removing the ability for Registrants to transfer domains directly with Nominet and therefore the difference is eliminated.

Since the introduction of EPP statuses, we have seen some registrars who did not previously utilise the investigation lock utilise the clientHold lock status in EPP to prevent abuse.

Proposal 22	We propose removing Nominet's bespoke Investigation lock and instead Registrars should utilise EPP client statuses to achieve the same results.
Questions	54. Do you currently use Investigation Lock for domain name abuse management in .UK? Yes/No 55. Do you currently use EPP client status for domain name abuse management in .UK? Yes/No 56. Do you support Proposal 22? Yes/No/I do not have an opinion? a. If 'mostly' or 'no', please explain why. 57. Do you have any additional comments on Proposal 22? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

The one benefit of the investigation lock is that Nominet has visibility of the reason a Registrar based lock has been set. That information is not visible to other Registrars nor is it visible to customers.

EPP allows Registrars (and the registry) to give a reason for the locks they set and to make them programmatically visible to others who may need to know this, e.g. a Registrar deciding whether to accept a transfer of a domain.

For example, it could be extended from:

```
<domain:status s="clientHold"/>
```

To optionally allow a reason from a set list, or free text:

```
<domain:status s="clientHold">Investigation</domain:status>
```

or

<domain:status s="clientHold">Registrant request</domain:status>

Additionally, server statuses set by the registry could be extended to include their lock names so Registrars are able to understand the reason for a particular server status without contacting Nominet.

Proposal 23	We propose to extend Nominet's existing implementation of EPP statuses (maintainable in both EPP and Web Domain Manager) to allow the optional inclusion of the reasons for the EPP status being set and: A. Accept a set list of text options; or B. Accept free text input.
Questions	58. Do you support Proposal 23? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 59. If Proposal 23 was implemented would you prefer option A or option B? Option A/Option B a. If Option A was selected what should the list of options contain? 60. Do you have any additional comments on Proposal 23? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 24	We propose to allow the proposed new status reasons to be visible in EPP and Web Domain manager for non-sponsoring Registrars.
Questions	61. Do you support Proposal 24? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 62. Do you have any additional comments on Proposal 24? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 25	We propose to allow the proposed new status reasons to be visible in RDAP to any public users.
Questions	63. Do you support Proposal 25? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 64. Do you have any additional comments on Proposal 25? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

8. Registrars who are not Members

Non-member Registrars do not benefit from a discounted registration fee and pay £80+VAT for a two-year registration period. Until 2012 when Nominet introduced 1-to-10-year registrations, all other aspects of the non-member lifecycle were identical to that of Registrars who are Members.

When the change from two-year registrations to 1-to-10-year registrations was introduced, the registration period for non-members remained unchanged. This meant not only a difference in pricing, but in the lifecycle process.

Codebase maintenance could be improved if we were to standardise the registration periods for non-member Registrars to align with the standard registration periods (the non-member fee being prorated accordingly).

Proposal 26	We propose to amend non-member registration and renewal periods to match the member periods i.e. 1 to 10 years.
Questions	65. Do you support Proposal 26? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 66. Do you have any additional comments on Proposal 26? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

9. Additional Technical changes to Extensible Provisioning Protocol (EPP) and registry fields.

There are several general restrictions made to .UK EPP, such as the inability to perform domain:info commands on other Registrars' domains, which are non-compliant with standard EPP. Some of those restrictions are related to a desire to prevent gaming of the former drop process, while other restrictions relate to historic decisions and the gradual evolution of .UK.

In this section, we set out proposed changes to:

1. Time
    a. We intend to increase the granularity of the timestamps in EPP and the wider registry to contain fractions of a second on all object types to bring it in line with industry norms. (i.e., 2023-01-04T14:11:32.238Z).
2. RFC 5731: Domain objects
    a. EPP Domain Info command (and equivalent view in Web Domain Manager)

We propose updating the EPP Domain Info command to include the following data in EPP query responses to the domain info command. Our general principle is if it is trivially determinable publicly, then any Registrar should be able to access the same information in EPP.

Domain Object		Proposed Details included in the EPP (or Web Domain Manager) response to a domain:info command.	
EPP Field	Description of field	Sponsoring Registrar	Non-sponsoring registrar
domain:name	The registered domain.	Yes	Yes
domain:roid	The unique repository object identifier for the domain object.	Yes	Yes
domain:registrant	The contact object ID that defines the registrant of the domain.	Yes	No; unless a correct auth code is supplied for the domain.
domain:contact	It is not currently possible to provide Administrative, Technical or Billing contacts for domains in .UK and we do not propose requiring them, but we propose allowing them should a registrant wish to supply them for access to services.	Yes	No; unless a correct auth code is supplied for the domain.
domain:status	Lock settings and pending delete status.	Yes	Yes
domain:ns	Any nameservers linked to a domain.	Yes	Yes
domain:host	Any sub-ordinate host objects for the domain stored in the registry.	Yes	No; unless a correct auth code supplied.
domain:crID	The EPP login ID for that created the domain. (essentially the TAG that created it).	Yes	Yes

domain:clID	The EPP login ID that controls the domain. (Essentially the TAG).	Yes	Yes
domain:upID	The EPP login ID that last updated the domain. (essentially the TAG that updated it).	Yes	Yes
domain:crDate	The create date of the domain.	Yes	Yes
domain:upDate	The update date of the domain.	Yes	Yes
domain:exDate	The expiry date of the domain.	Yes	Yes
domain:trDate	The last transfer (of registrar) date of the domain.	Yes	Yes
domain:authinfo	A unique auth code for the domain will be introduced. *The registry will set a Time-To-Live on all auth-codes to a maximum of 15-days from the time it is set.*	No	No
rgp:rgpstatus	The RFC3915 Registry Grace Period status.	Yes	Yes
secDNS:dsData	DNSSEC data for domain.	Yes	Yes
domain-ext:auto-bill	The number of days before every expiry that the registrar wishes to automatically trigger a renewal.	Proposal to remove this functionality is covered under the lifecycle section.	
domain-ext:next-bill	The number of days before the next expiry that the registrar wants to trigger a renewal.	Proposal to remove this functionality is covered under the lifecycle section.	
domain-ext:renew-not-required	Field can contain Y/N	Proposal to remove this functionality is covered under the lifecycle section.	

domain-ext:reseller	A field that contains a resellers reference to link the reseller data for a domain.	We propose modernising our reseller implementation to utilise RFC8543 Organisation Mapping and RFC8544 Organisation Extension and remove this extension. See below.
domain-ext:notes	Registrar free text notes.	We propose removing this field. See below.

b. Resellers – our current implementation of EPP means that commands related to the setup of resellers cannot be used on the same EPP session as domain management. This means a Registrar's EPP client must login separately to process these, while the EPP extension to link the reseller to the domain can be used in the domain management EPP session. Our current implementation is limited in functionality, and we propose removing it. Instead, it will be possible to link Domain objects to Organisation objects where the organisation is a reseller using RFC8543 and RFC8544.
c. EPP Notes field data dates back to recording details in relation to paper certificates and is not currently used by Nominet. It is not shown publicly, and it is only utilised by a few Registrars. We propose removing this field.
d. Any Registrar that controls a domain will be able to update which contact is linked as the Registrant, but must only link contact objects within their own control. (Today this functionality is only available to accredited channel partners).
e. Any Registrar that controls the domain may delete a domain name subject to policy constraints.
f. The updated date will match the timestamp of the last successful UPDATE, TRANSFER completion or RENEW command or auto-renew date on the object or any of the object extensions.
g. All references to host objects will not have a trailing dot in compliance with RFC5731 section 2.1.
h. Where a domain object has a timestamped create date and expiry date, the time element will be identical.

Proposal 27	We propose adopting the documented implementation for domain objects as detailed in the consultation document.
Questions	67. Do you support Proposal 27? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 68. Do you have any additional comments on Proposal 27? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

3. RFC5732: Host objects
    a. In .UK, EPP host objects are limited to having one IPv4 and one IPv6 address. This relates to historic compatibility with the old automaton in the codebase. In moving to use our Registry Services Platform, we propose amending this to bring it in line with the RFC, allowing a host object to have multiple IPv4 and/or IPv6 addresses.
    b. EPP Host Info command
        i. We propose updating the EPP Host Info command to include the following data in EPP query responses to the host info command. Our general principle is if it is trivially determinable publicly, then any Registrar should be able to access the same info in EPP.

Host Object		Proposed Details included in the EPP (or Web Domain Manager) response to a host:info command.	
EPP Field	Description of field	Sponsoring Registrar	Non-sponsoring registrar
host:name	The current host name.	Yes	Yes
host:roid	The unique repository object identifier for the host object.	Yes	Yes
host:status	Lock settings and link status.	Yes	Yes
host:addr	Any IP address glue records.	Yes	Yes
host:crID	The EPP login ID for that created the host. (historically known as thestagthat created it).	Yes	Yes
host:clID	The EPP login ID that controls the host. (historically known as the TAG).	Yes	Yes
host:upID	The EPP login ID that last updated the host. (historically known as the TAG that updated it).	Yes	Yes
host:crDate	The create date of the host.	Yes	Yes
host:upDate	The update date of the host.	Yes	Yes

host:trDate	The last transfer (of registrar) date of the host.	Yes	Yes

ii. Host objects will support multiple IPv4 and IPv6 addresses.
iii. Host objects will not have a trailing dot in compliance with RFC5731 section 2.1
iv. Where a parent domain is linked to a reseller using RFC8543 and RFC8544, the info command for host object will show the linkage to the reseller.
v. The updated date will match the timestamp of the last successful UPDATE, TRANSFER completion on the object or any of the object's extensions.

Proposal 28	We propose adopting the documented implementation for host objects as detailed in the consultation document.
Questions	69. Do you support Proposal 28? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 70. Do you have any additional comments on Proposal 28? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

4. RFC5733 Contact objects
   a. EPP Contact info
      i. We propose updating the EPP Contact Info command to include the following data in EPP query responses to the contact info command. Our general principle is if it is trivially determinable publicly, then any Registrar should be able to access the same info in EPP.

Contact Object		Proposed Details included in the EPP (or Web Domain Manager) response to a contact:info command.	
EPP Field	Description of field	Sponsoring Registrar	Non-sponsoring registrar
contact:id	The contact ID.	Yes	Yes
contact:roid	The unique repository object identifier for the contact object.	Yes	Yes
contact:status	Lock settings and link status.	Yes	Yes

contact:postalinfo	Contains a range of fields:
	• contact:name
	• contact:org
	• contact:addr
	  o contact:street
	  o contact:city
	  o contact:sp
	  o contact:pc
	  o contact:cc
		Yes	No; unless either a valid auth code is provided for the contact object or an individual field has contact:disclose set to disclose.

contact:voice	The telephone number of the contact.	Yes	No; unless either a valid auth code is provided for the contact object or the individual field is set to disclose.
contact:fax	The fax number of the contact.	Yes	No; unless either a valid auth code is provided for the contact object or the individual field is set to disclose.
contact:email	The email address of the contact.	Yes	No; unless either a valid auth code is provided for the contact object or the individual field is set to disclose.
contact:crID	The EPP login ID for that created the contact. (essentially the TAG that created it).	Yes	Yes
contact:clID	The EPP login ID that controls the host. (essentially the TAG).	Yes	Yes
contact:upID	The EPP login ID that last updated the contact. (essentially the TAG that updated it).	Yes	Yes
contact:crDate	The create date of the contact.	Yes	Yes
contact:upDate	The update date of the contact.	Yes	Yes

contact:trDate	The last transfer (of registrar) date of the contact.	Yes	Yes
contact:authinfo	A unique auth code for the contact.	No	No
contact:disclose	Contains the status of disclose or not for each of: • contact:name • contact:org • contact:addr • contact:voice • contact:fax • contact:email	Yes	Yes
contact-ext:trad-name	Currently accepts an optional trading name.	Existing Nominet only extension will not be supported.	
contact-ext:type	Currently accepts an optional organisation type.	Existing Nominet only extension will not be supported.	
contact-ext:co-no	Currently accepts an optional organisation number.	Existing Nominet only extension will not be supported.	

ii. We intend that if contact:org does not exist, Nominet will cease automatically duplicating the data from contact:name leaving the rest of the data as is. This functionality existed to make EPP compatible with the now defunct automaton.

iii. We will support both ASCII (or Internationalised form) and Unicode (or Localised) postal info as per the EPP standard alongside each other. Registrars are free to choose which to utilise or to use both; where a Registrar uses both (e.g. to identify the Registrant in their native character set and in English) the data must be equivalent in each.

iv. Our default of not publishing contact data will remain the default in line with our response to GDPR. We already allow an opt-in of publishing some data but that does not currently include, for example, the option to publish phone or email addresses – we propose to support *optional* opt in on all EPP contact disclosure fields for publication.

v. The following contact fields, which date back to compatibility with the pre-EPP automaton, are currently optional across the registry and as a result they have very little active usage. We intend to remove these fields:

1. Trading name

2. Organisation type
3. Organisation number

vi. It will be possible to link contact objects to Organisation objects where the organisation is a reseller using RFC8543 and RFC8544.
vii. The updated date will match the timestamp of the last successful UPDATE, TRANSFER completion on the object or any of the object extensions.
viii. All fields within contact objects will be updatable by the Registrar that controls the contact object.
ix. To change a Registrant a Registrar MUST use a new contact and change the linked contact on the domain; this is not technically enforced, but will be contractually enforced through audit.

Proposal 29	We propose adopting the documented implementation for contact objects as detailed in the consultation document.
Questions	71. Do you support Proposal 29? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 72. Do you have any additional comments on Proposal 29? Please include any details of how we can minimise any negative impact of this change and maximise any benefit?

5. RFC8543: Organisation Mapping and RFC8544: Organisation Extension

We intend to introduce Organisation mapping objects to the registry and associated linkage to existing object types to replace the reseller fields.

At the time of transition to the new Registry platform we will support the following organisation types:

a. reseller
    i. A reseller organisation can be linked to a domain, host or contact object using RFC8544.
    ii. In bailiwick host objects will strictly inherit any linkage to a reseller from their parent domain.
b. privacyproxy
    i. Contact objects associated with approved proxy providers under Nominet's Proxy Services framework must be linked to an organisation object representing the approved Proxy provider using RFC8544.

Contact Object		Proposed Details included in the EPP (or Web Domain Manager) response to a org:info command.	
EPP Field	Description of field	Sponsoring Registrar	Non-sponsoring registrar
org:id	Unique server ID of organisation.	Yes	Yes
org:roid	Repository Object ID, unique over time ID for organisation.	Yes	Yes
org:role	Roles the organisation holds and includes: • org:type – at transition we will only support 'reseller'. • org:status • org:roleID	Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.
org:status		Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.
org:parentid		Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.
org:postalInfo	Contains a range of fields: Org:name Org:street Org:city Org:sp Org:pc Org:cc	Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.
org:voice		Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.

org:fax		Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.
org:email		Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.
org:url		Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.
org:contact		Yes	Yes, for organisation types "reseller" and "privacyproxy" as they are intended to be public information.
org:clID	The EPP login ID that controls the organisation object.	Yes	Yes
org:crID	The EPP login ID for that created the organisation object.	Yes	Yes
org:crDate	The create date of the organisation.	Yes	Yes
org:upDate	The update date of the organisation.	Yes	Yes

Proposal 30	We propose adopting the documented implementation for organisation objects as detailed in the consultation document.
Questions	73. Do you support Proposal 30? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 74. Do you have any additional comments on Proposal 30? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

6. Proxy Services Framework

Our current proxy service framework is not well defined technically. With the proposed introduction of RFC8543 and RFC8544 to our platform for reseller information, there is an opportunity to also use that for proxy information and address this.

At present, those operating a proxy service must notify Nominet of the details of that proxy service out of band from our registry systems. With the introduction of RFC8543 (EPP Organisation Mapping), a proxy service can be defined as an organisation. Then using RFC8544, any contact that represents proxy service data should be linked directly to the RFC8543 organisation object either via EPP or the Web Domain Manager.

We expect further discussions around proxy services will be included in our discussions on the future of data quality and the developing public policy.

Proposal 31	We propose to amend the .UK Registry Registrar Agreement to utilise RFC8543 and RFC8544; the Registrar must inform Nominet of the org:id used in the organisation mapping (RFC8543) for their proxy service and link domains and contacts to that organisation object.
Questions	75. Do you support Proposal 31? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 76. Do you have any additional comments on Proposal 31? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

7. Domain cancellation which is not as a result of expiry

Currently the start of the .UK drop process for a domain is:

a. at the point a domain is suspended for non-renewal and put into RFC5731 pendingDelete state with RFC3915 RedemptionPeriod state; or
b. if a domain is deleted prior to suspension for non-renewal it is entered into RFC5731 pendingDelete and RFC3915 pendingDelete state.

With the proposed change in lifecycle, the start of the drop process will remain the same for most drops, which relates to expiry but differ for drops due to early cancellation. It can be described as:

a. at the point that the delete command is issued (via EPP or Web Domain Manager) for a domain, or

b. the point in time in which the Registrar's accreditation is configured to automatically start the deletion process for an unrenewed domain. (Mirroring current end-of-life behaviour.)

In both circumstances, the domain will be put into RFC5731 pendingDelete state with RFC3915 RedemptionPeriod state. In essence, where a Registrant has chosen to instruct the deletion of a domain, they will now have a *new* opportunity to reflect, restore and retain the domain.

Proposal 32	We propose adding an RFC3915 Redemption Grace Period for domains which are cancelled at any time outside the add grace period.
Questions	77. Do you support Proposal 32? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 78. Do you have any additional comments on Proposal 32? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

10. Data Quality

Data quality is a key element for any Registry or Registrar business. We all share the aim of ensuring we hold accurate and up to date information on our customers.

In reviewing our underlying data quality process, it is clear that our current Data Quality implementation has operational challenges for Nominet, Registrants and Registrars.

Simultaneously, there are wider legislative reforms such as the European Union's NIS2 Directive Article 28 which, while not directly applicable to the UK, will apply to many of our Registrars servicing the European market and are also expected to influence UK policy makers.

Considering the challenges we see with our current approach and the likelihood of changing expectations on Registrars and Registries in relation to Registrant data, we suggest the following; rather than porting the current implementation across to the new platform, we propose to launch a separate industry engagement process to identity how our approach to data quality in the .UK registry should evolve.

Proposal 33	We propose to: A. continue to expect Registrars to obtain correct and accurate data from a Registrant and supply it to the .UK Registry; and

	B. retain the suspension of domains where Nominet has reasonable grounds to believe the data is either inaccurate or incomplete; and C. remove Nominet's bespoke validation processes in EPP and Web Domain Manager used by Accredited Channel Partners; and D. adopt the interim 'Proposed Policy 4 Data Quality Policy' in the consultation at the point of transition to the new platform; and E. launch an industry engagement process on finding solutions to better address the needs of data quality in the .UK Registry.
Questions	79. Do you support Proposal 33? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 80. Do you have any additional comments on Proposal 30? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

Proposed Policy 4: Interim Data Quality Policy.

Policy version: DRAFT-2024-01
We intend to work with stakeholders to develop a suitable Know Your Customer policy ahead of transitioning .UK to the new Registry platform. In the event this work is not completed ahead of transition, we propose to replace the existing Data Quality policy with this interim policy.

1. Introduction

Improving and maintaining the quality of the data on the register for .UK domain names is a key objective for Nominet. We have and will continue to take steps to achieve this and believe that registrars play a key role in helping us to do so. This Data Quality Policy sets out some of the ways we expect registrars to help us improve our data quality.

N.B. terms that have been capitalised in this document have the meaning set out in the "Definitions" section at the end of this Policy.

2. Data Quality Policy Statement

Registrars must submit Complete and accurate data in their transactions with us. Registrars must ensure that data they submit to us can be Validated.

All Registrars must be satisfied that the email address for the Registrant is a reliable means by which to contact the Registrant.

3. Incomplete Data

Where data submitted by a Registrar is incomplete, it will not be accepted by our systems and the relevant transaction submitted by the Registrar will be rejected in real time.

4. Data Validation

Nominet may Validate any Registrant data submitted to us. Where Nominet determines that data submitted cannot be Validated, Registrars will be required to take steps to resolve the issue. These requirements are:

The Registrar must take appropriate steps to confirm to Nominet that the data is Valid. For example, the Registrar may choose: to ask the Registrant to provide corrected data; to confirm that the data is reliable based on its own knowledge or information from a trustworthy third party source; or, to obtain documentary evidence that the data is reliable such as a utility bill or similar document.

Nominet may suspend domain names where we are unable to Validate data.

5. Processes and Auditing

Nominet will monitor a Registrar's compliance with this policy through its data quality audits of Registrars.

6. Updating this Policy

Nominet will review this policy on a regular basis to ensure it continues to reflect best practice and current practices within the industry. We may update this policy by providing all Registrars with at least 30 days notice and posting the new policy on our website.

7. Definitions

"Complete" means that data complies with the format requirements enforced by the registry system;

"Incomplete" means data that is not Complete; and,

"Validate" means confirming that data is reliable by comparing it to data provided by a trustworthy source (which may be a third party database), and "Valid" and "Validated" shall be understood accordingly.

11. Operational Approach

Nominet operates a 3-way contractual environment for .UK where:

1. Nominet has a contract with the Registrar (The Registry-Registrar Agreement) for the Registrar to operate as the agent of the Registrant.
2. The Registrar has a contract with the Registrant binding the Registrant to Nominet's terms and conditions of registration.
3. The Registrant has a contract with Nominet.

Under this contractual setup, Nominet has historically restricted the actions a Registrar with agency of the Registrant can take. This has often forced Registrants to come to Nominet for some aspects of support where for top-level domains like .cymru or .wales the Registrar has been able to handle the customer needs directly and efficiently themselves.

We believe we should revise our emphasis to enable Registrars to offer a full service to their customers. We believe the 3-way contract remains valuable to enable Nominet to act where escalation is required by the Registrant, where a Registrar is not meeting their contractual obligations.

Proposal 34	We propose to enable all Registrars to offer Registrants full support to manage a domain's full lifecycle (automatable via EPP or manual via online services).
Questions	81. Do you support Proposal 34? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 82. Do you have any additional comments on Proposal 34? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 35	We propose to change Nominet's emphasis from being the only support path for some domain actions to being *only* an escalation support path where the Registrant is having challenges with their Registrar.
Questions	83. Do you support Proposal 35? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 84. Do you have any additional comments on Proposal 35? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

Registrant Support

In .UK today, Nominet's online services allows Registrants to login, view their domains and directly instruct Nominet to:

- Amend the Registrant name or Registrant type related to a Registrant contact.
- Amend the contact details of a Registrant.
- Amend the publication status of the Registrant's name in WHOIS.
- Amend the publication status of the Registrant's address in WHOIS.
- Change the Registrant of a domain.
- Transfer a domain to a new Registrar.
- Request cancellation of a domain.

These elements are currently required because other policies restrict Registrars from supporting their Registrants in some of these areas. We are proposing to remove the restrictions on Registrars and therefore also propose removing this direct support - except where a Registrant needs escalated support from Nominet.

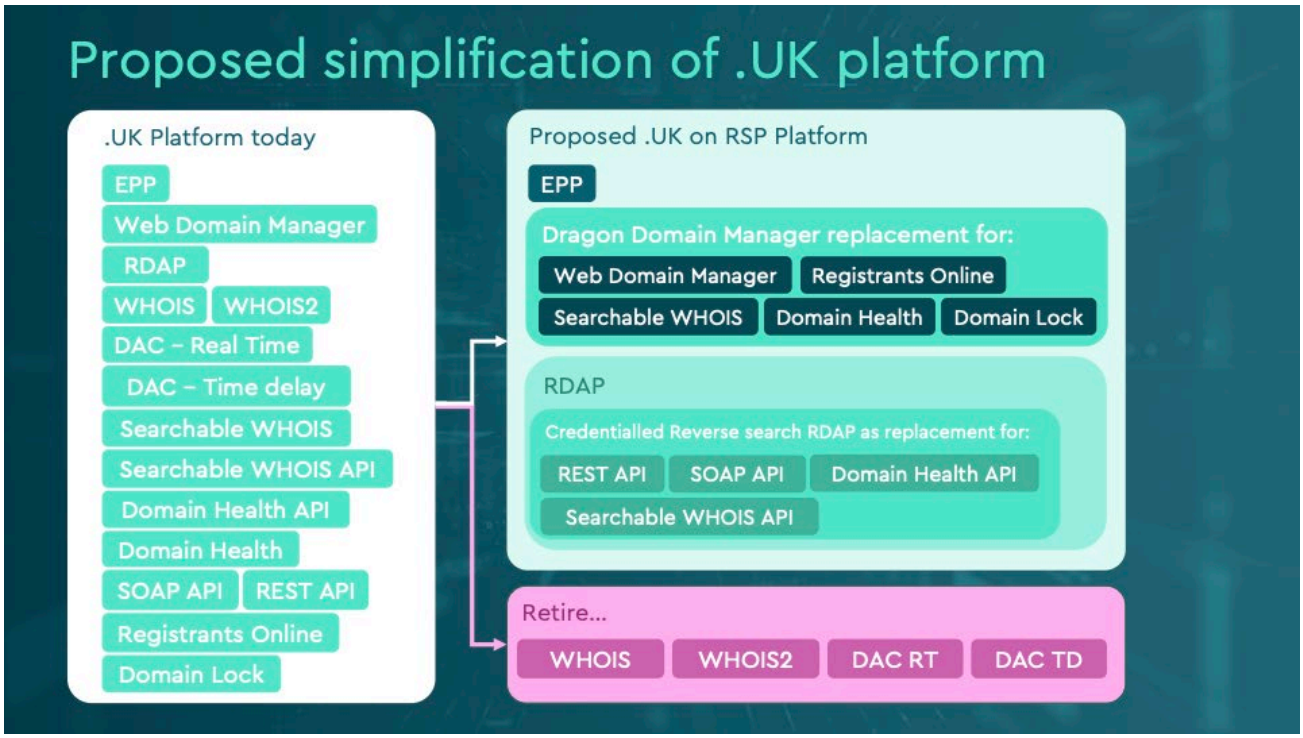
We do not believe it is necessary to issue Transfer Authorisation Codes directly to Registrants. This would only be necessary if a Registrar was failing to comply with the relevant registry policy. Instead, we will focus on addressing any systemic breaches through our compliance activity.

Proposal 36	We propose that because Registrars will be able to offer a full service to Registrants, we will no longer accept day-to-day direct instructions from Registrants for updates to domains, except as part of an escalation and complaints process where a Registrar has not complied with either the Registry-Registrar Agreement or Registry Policies.
Questions	85. Do you support Proposal 36? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why. 86. Do you have any additional comments on Proposal 36? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.
Proposal 37	We propose that Registrants will retain the option to login to Nominet's online services portal and have full visibility of their own domains and raise secure escalated support requests to Nominet. Registrants will be directed to their Registrar for all day-to-day updates.
Questions	87. Do you support Proposal 37? Yes/Mostly/No/I do not have an opinion a. If 'mostly' or 'no', please explain why.

	88. Do you have any additional comments on Proposal 37? Please include any details of how we can minimise any negative impact of this change and maximise any benefit.

12. Summary

The combined proposals in this consultation will result in a simplified operating environment for Registrars and Registrants, while modernising the underlying systems. The diagram below provides a visual summary of how we expect .UK to evolve into the proposed new setup.



Questions	89. If you are a Registrar and these proposals go ahead, what notice period and testing period would you need to minimise impact to you and your customers? 90. Are there any other things Nominet could do to minimise any negative impacts of the proposed changes on Registrars and Registrants that you have not raised in your other answers? 91. Do you have any other feedback on these proposals that are not covered by this consultation? 92. Do you have any other system feature requests for future consideration?