

Modernisation, standardisation, and legacy service retirement consultation feedback summary

Executive summary

On Monday, 29th January 2024 Nominet launched a consultation on proposals to make changes to the .UK registry platform. The proposals aim to modernise systems and processes, standardise some of Nominet’s bespoke registry systems with IETF defined standards where appropriate and retire some legacy interfaces. The proposals are informed by feedback received on a product discussion paper published in 2022.

We received 112 consultation responses submitted through the online form. Feedback also came via a small number of emails sent directly to the team. The .UK Registry Advisory Council also submitted a collective response which was broadly supportive of the changes to standardise and is available in full. All feedback has been reflected in the relevant section of this feedback summary.

The responses represent 69% of .UK domains under management (DUM) and were split between various business types:

Business type	Number of responses	% of responses (rounded)	% of registrars (rounded)
Access provider	3	2%	4%
Brand Protection	4	4%	1%
Corporate	1	1%	9%
Domain investor	21	19%	18%
IT Infrastructure	14	13%	17%
Retail and Hosting	64	58%	51%
Wholesale	2	2%	1%
Registrant/Unknown	3	3%	

57 respondents who are registrars have less than 1000 DUM, 26 have between 1001 and 10,000 and 26 have over 10,001. Two respondents were registrants; therefore, DUM was not relevant and the DUM of one respondent is unknown.

Overall stakeholders were supportive of the proposals but have highlighted issues relating to the proposed lifecycle, inter-registrar transfer process and operational approach which would benefit from further consideration.

Stakeholder engagement

Throughout the consultation we have communicated with stakeholders to raise awareness of the consultation, provide information regarding the proposals and encourage feedback. In addition, we have posted on the Member Community and social media. We also contacted a commonly used supplier of EPP integration software for their feedback.

Nominet's customer support team carried out a short call outreach programme to 1415 registrars selected randomly from the total number of registrars. Of the 575 registrars where the advisor spoke to the contact 445 were aware of the consultation. Individual emails were sent directly to a further 506 registrars to highlight the consultation and engagement opportunities held to encourage participation. Recordings of the webinars and Q&As were made available on Registrar Resources.

A summary of stakeholder engagement is set out in the table below:

Activity	Date	Audience
Announcement email	29/01/2024	All members
Membership Matters	12/02/2024	Members opted into updates
Webinar: Consultation overview	20/02/2024	All stakeholders
Reminder email	29/02/2024	All members
Membership Matters	06/03/2024	Members opted into updates
Webinar: Inter-Registrar Transfer Process	11/03/2024	All stakeholders
Reminder email	25/03/2024	All members
Webinar: .UK lifecycle	26/03/2024	All stakeholders
Membership Matters	10/04/2024	Members opted into updates
Virtual Q&A	18/04/2024	All stakeholders
Virtual Q&A	24/04/2024	All stakeholders
Reminder email	25/04/2024	All members

About this summary

This summary presents the quantitative results of the survey and provides a snapshot of the main themes we heard through the additional comments respondents provided. It has not been possible to reflect every comment due to the broad range of views reflective of the range of different business models and personal experience. We have endeavoured to represent the key issues either in support or of concern where they have been provided. We will continue to review the helpful suggestions respondents provided particularly in relation to how we can minimise any negative impact of the changes and maximise benefit.

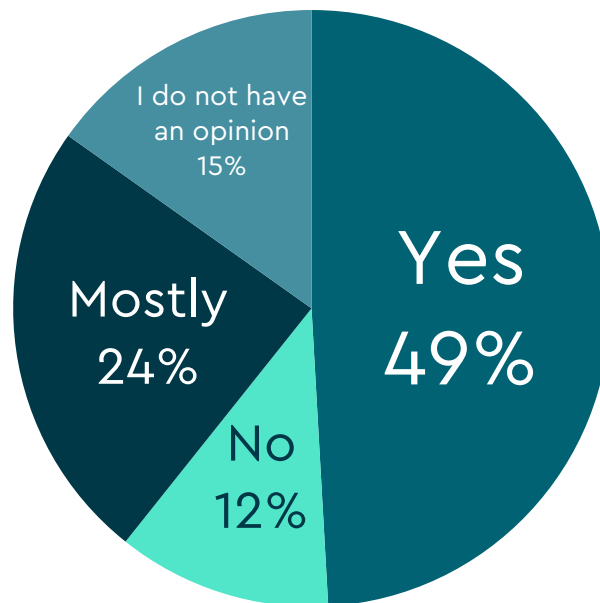
Legacy technology

In this section of the consultation, we identified some legacy technologies that could either be retired or replaced with more modern alternatives. These included:

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

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.

Do you support Proposal 1?



Statistically there was general support for this proposal but the comments highlighted concerns about the complexity of RDAP, how easy it would be to integrate with other software such as WHMCS, limits on checks and the timeframe.

Of those respondents that indicated they either mostly supported or did not support the proposal some voiced concerns over WHOIS (Port 43) being simple to use and commonly recognised by users and RDAP being overly complex for simple domain look ups.

We acknowledge that RDAP is not currently as commonly used as WHOIS however we expect that by making this change we will in some part encourage deployment of RDAP clients and increase usage across all TLDs, which in turn will improve confidence and trust in the responses because of the security provided by RDAP that is not available for WHOIS. We believe there is benefit in this because it is a secure protocol, and our proposed timing is aligned with the same changes starting in gTLDs.

Some suggested continuing to run both WHOIS (port 43) and RDAP for a longer period of time.

It is apparent that some registrars are using WHOIS (port 43) as a domain availability checker. We are aware that other TLDs provide an 'unavailable names list' daily which can be cached and can

help provide a quicker response in the registrar environment to the end user. This could be provided in a similar fashion to the drop list already provided.

It is also clear that we need to provide more educational materials and support to registrars on ways to use each of our systems to benefit user experience and that communications regarding retiring the service will need to be clear and well thought out. In terms of signposting that the service will be retired we could add a final line to existing .UK WHOIS output to announce when the service will cease and the alternatives to use. We will give further consideration to these areas of concern.

It is also clear that there is a lack of awareness of RDAP amongst registrars with some unaware that RDAP is already implemented and operating in parallel and anyone can use it now.

We take on board the concerns around the retirement date of Wednesday 29th January 2025 and acknowledge that some registrars will have to dedicate development time to complying with updated ICANN processes, and the forthcoming implementation of NIS2 across the EU which will be in force by October 2025. We will therefore develop a project plan for delivery and give consideration to the timings of these external impacts on registrars.

There was also a request to consider using an alternative standard for the RDAP implementation for contacts. This is an area we are paying close attention to and will give further consideration as the protocol and industry develops implementations.

UKRAC RESPONSE TO PROPOSAL 1

The UKRAC supports Proposal 1.

Registrants are likely to use the term "WHOIS" for many years to come. Nominet should encourage registrars to make the switch to RDAP and update tools for registrants and publicise these changes.

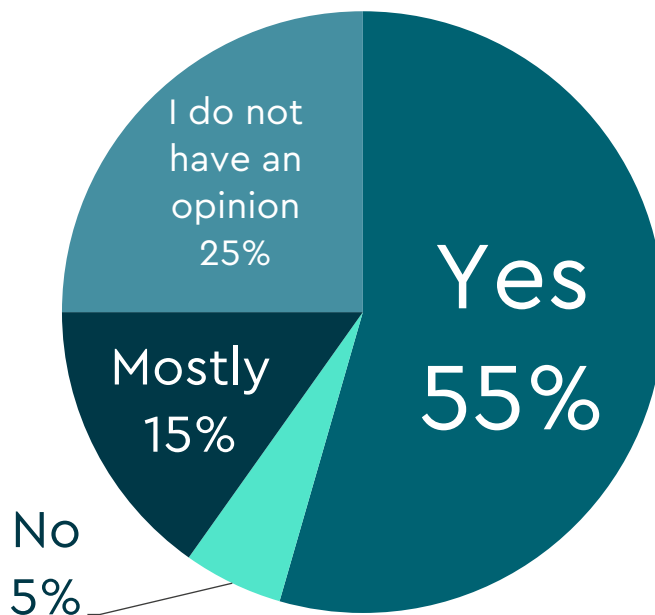
RDAP tools are not widely developed yet, but a clear timeline on withdrawal of WHOIS should help. A higher limit authenticated service should be offered.

We note that existing RDAP clients include the web-based versions at <https://rdap.nominet.uk/> <https://lookup.icann.org> and a command line version available from <https://github.com/icann/icann-rdap> but we agree they are not as commonly used today as WHOIS.

Proposal 1	Recommendation
<p>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.</p>	<ul style="list-style-type: none">• Create and publish a high-level project plan for .UK modernisation.• Ensure that the timing of each of the deliverables on the project plan can allow an improvement of end user experience with registrars.• Plan to retire port 43 WHOIS no earlier than Wednesday 29th January 2025 and provide the date in the project plan.• Provide an 'unavailable names report' daily to registrars a minimum of 3-months ahead of port 43 WHOIS being retired.• Review the list of existing third-party integrations provided as feedback to determine which utilise WHOIS as an availability tool and make appropriate plans.• Provide educational materials and support to registrars regarding the use of our systems including RDAP.

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.

Do you support Proposal 2?



Comments on this proposal were mostly along the same lines as for the retirement of WHOIS (port 43) in proposal 1. There are concerns about RDAP being slow and having restrictions on the volume of queries allowed. WHOIS2 was designed as a proxy entry point to port 43 WHOIS to allow registrar websites to offer data directly to customers because port 43 cannot be queried directly from a web browser. RDAP allows for a dispersed web browser-based lookup mechanism to the end user's IP and therefore a quota is not necessary for the intended or contractually allowed use of WHOIS2. However, some of the responses indicate that services may not be being used for their contractually intended purpose. It would be useful for Nominet to provide detailed instructions on when to use each of the services.

Of those that said they integrate with WHOIS2 there was general agreement on the need for change provided the replacement services meet the needs of the market.

UKRAC RESPONSE TO PROPOSAL 2

The UKRAC supports Proposal 2.

There should be a RDAP equivalent of Whois2 for high traffic sites.

High traffic sites should not need any additional lookup quota than a low traffic site if coded to carry out the query from the user's web browser to Nominet's service. The limitation in place in this scenario would mimic those today in WHOIS and WHOIS2.

Proposal 2	Recommendation
<p>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.</p>	<ul style="list-style-type: none">• Plan to retire WHOIS2 no earlier than Wednesday 29th January 2025, and provide the date in the project plan.• Provide an 'unavailable names report' daily to registrars a minimum of 3-months ahead of WHOIS2 being retired.• Provide educational materials and support to registrars regarding the use of our systems.

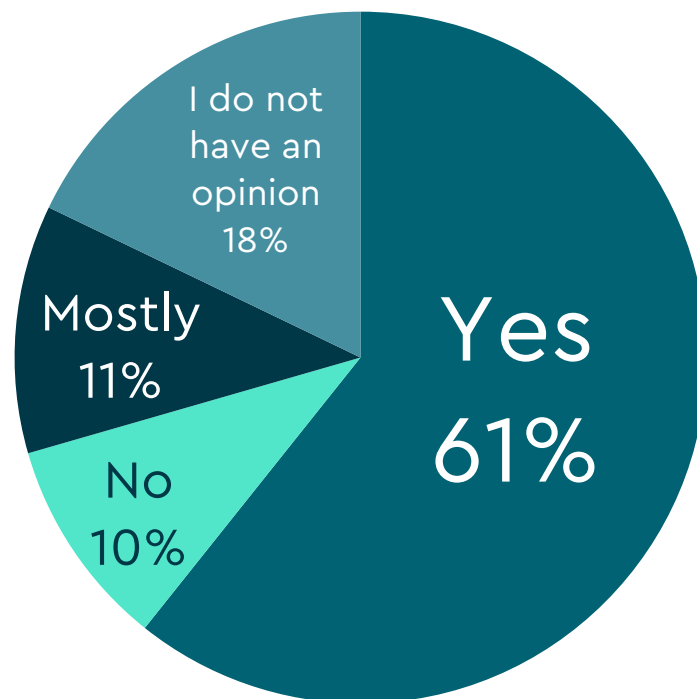
PROPOSAL 3: WE PROPOSE:

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.

C. ANY SUBSCRIPTION FEES PAID COVERING JANUARY 2025 OR AFTER WILL BE REFUNDED ON A PRO-RATA BASIS FOR EACH CALENDAR MONTH.

Do you support Proposal 3?



Respondents like the responsiveness of the DAC and the ability to check the availability of a domain very quickly. Whilst statistically there were far more respondents in favour of retiring the DAC, some users did have concerns that RDAP could not perform the same function and we agree as it is not intended to.

There were helpful suggestions of how we could mitigate the removal of the DAC which helped us identify that the provision of an unavailable names report could improve on the DAC for customer sales in the registrar environment allowing pre-cached data in registrar searches speeding up name spinning tools.

Some respondents were supportive as long as restrictions on the check command were removed from EPP (proposal 4).

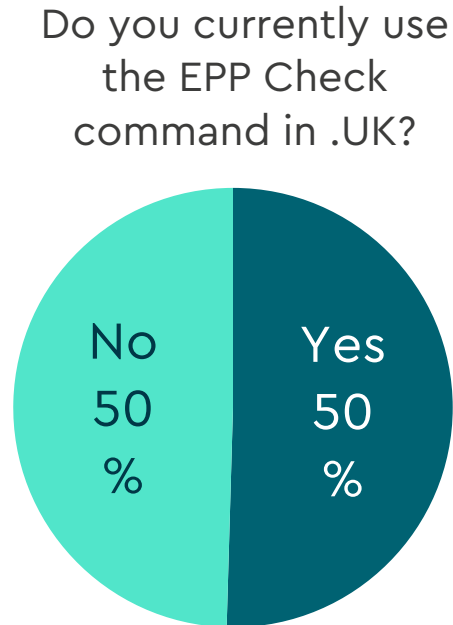
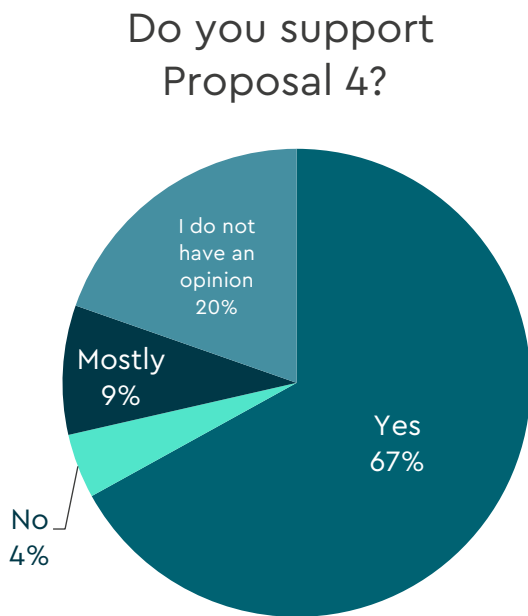
Others were concerned about the proposed timeframes.

UKRAC RESPONSE TO PROPOSAL 3

The UKRAC supports Proposal 3.

Proposal 3	Recommendation
<p>We propose:</p> <ul style="list-style-type: none">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.c. Any subscription fees paid covering January 2025 or after will be refunded on a pro-rata basis for each calendar month.	<ul style="list-style-type: none">• We have stopped accepting new applications for new usage of the DAC from Monday 3rd June 2024 onwards as this ensures no new integrations are deployed using the DAC.• Provide an 'unavailable names report' daily to registrars a minimum of 3-months ahead of DAC being retired.• Plan to retire DAC no earlier than Wednesday 29th January 2025 and provide the date in the project plan.• Any subscription fees paid covering the month the DAC is retired and after will be refunded pro-rata for each calendar month.

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.



The majority of respondents supported the removal of the limitation on the EPP check command but some comments highlighted concern over abuse. Our intention is to only remove the specified limit and to retain the rest of the clause which allows us to address abuse.

UKRAC RESPONSE TO PROPOSAL 4

The UKRAC supports Proposal 4.

Many UKRAC members said they used the EPP Check command, but it had limited use.

The UKRAC notes limits on create fail are retained which in turn retains control over drop catching & abuse of registry systems. Higher limits will enable use of this command to be more useful.

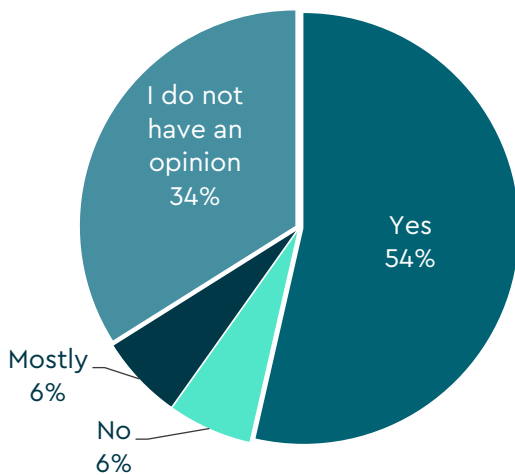
We agree the EPP Check command will be more useful as a result of these changes and be aligned with other registries.

We note that with drop lists and the specific implementation of the drops process there is no benefit to utilising the EPP Check command to determine a dropping domain other than once to get the time of drop. We would like to reconfirm that all other aspects of the existing Acceptable Use Policy will remain in force and repeated check queries for the same domain around drop time are subject to the policy.

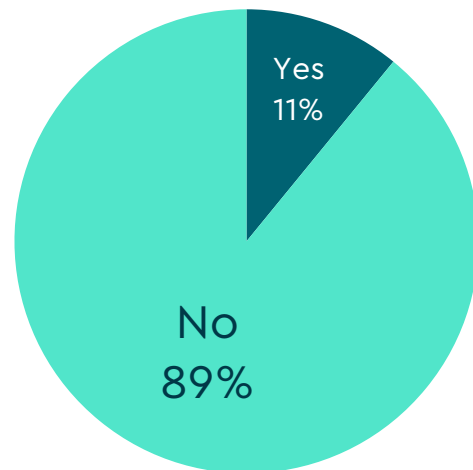
Proposal 4	Actioned
We propose to remove the specific limitation on the usage of the check command in both EPP and Web Domain Manager on Tuesday, 4th June 2024 whilst retaining the rest of the Acceptable Use Policy for EPP and Web Domain Manager.	<ul style="list-style-type: none">• Implemented as proposed.

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.

Do you support Proposal 5?



Do you currently use the Searchable WHOIS API in .UK?



A large majority of respondents stated they do not currently use the Searchable WHOIS API. Of those that indicate they use the API only two were against the proposal. Some respondents who do not currently use it and did not support the proposal stated that Nominet should continue to maintain services if customers were using them. Other respondents were reluctant to use RDAP. We note the primary Searchable WHOIS service will remain as a web service not requiring RDAP.

UKRAC RESPONSE TO PROPOSAL 5

The UKRAC supports Proposal 5.

Members of the UKRAC were not users of the Searchable WHOIS API.

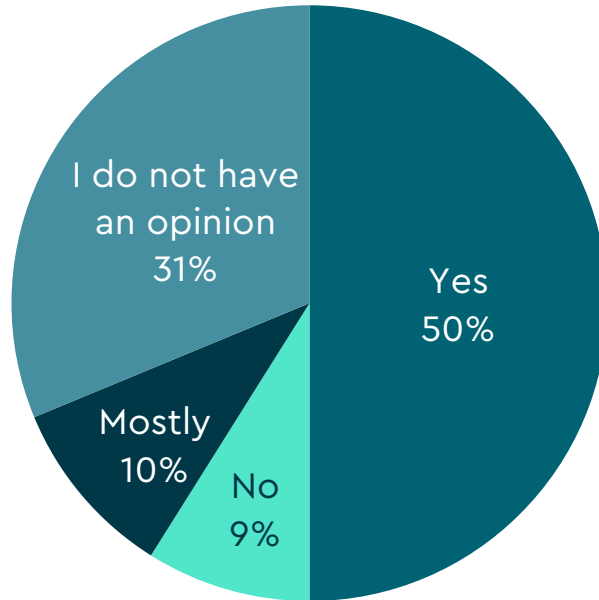
Current service is expensive and other options exist. Will there be a cost for the replacement service?

We have not proposed any changes to the Searchable WHOIS service or the pricing, only to the API that sits alongside it. We note the feedback and will review along with other service feedback for future planning.

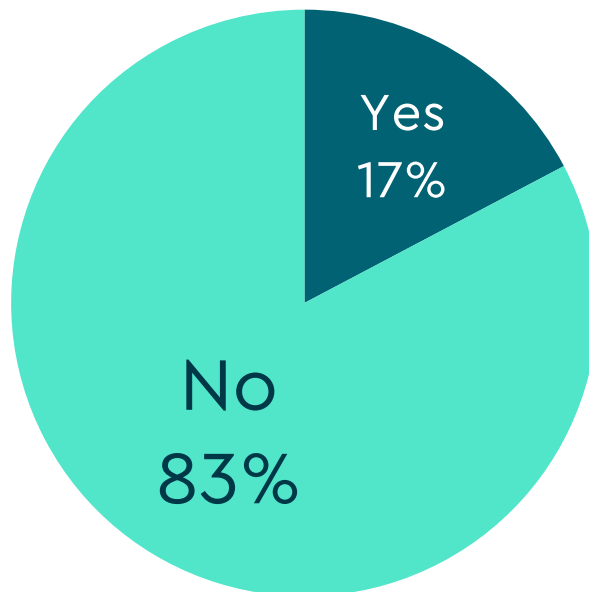
Proposal 5	Recommendation
<p>We propose to retire the Searchable WHOIS API and replace it with an equivalent credentialled Reverse Search RDAP at the point of transitioning .UK to the Nominet RSP platform.</p>	<ul style="list-style-type: none">• Provide a testbed implementation of Reverse Search RDAP at least 3 months before transitioning .UK to the RSP platform. Identify the provision date on the project plan.• At the time of transition to the new platform a Reverse Search RDAP implementation will replace the Searchable WHOIS API.

PROPOSAL 6: WE PROPOSE TO RETIRE THE LIST REST API AND REPLACE IT WITH A CREDENTIALLED REVERSE SEARCH RDAP EQUIVALENT.

Do you support Proposal 6?

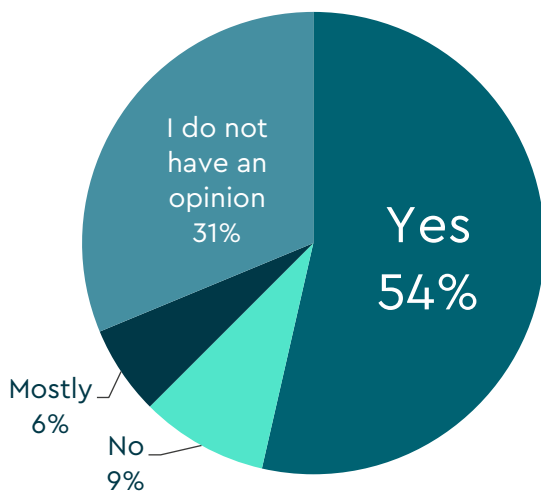


Do you currently use the LIST REST API?

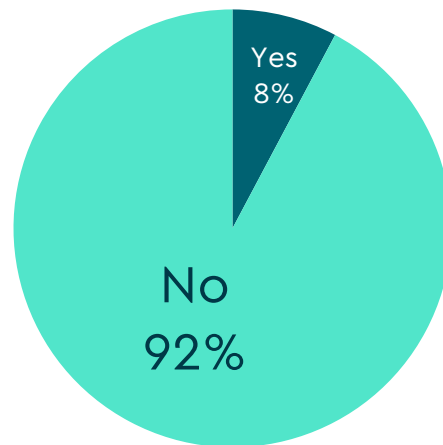


PROPOSAL 7: WE PROPOSE TO RETIRE THE LIST SOAP API AND REPLACE IT WITH A CREDENTIALLED REVERSE SEARCH RDAP EQUIVALENT.

Do you support Proposal 7?



Do you currently use the LIST SOAP API?



Respondents to proposals 6 and 7 noted that the current API returned limited data and that RDAP would provide more, however, in line with other concerns expressed regarding RDAP, there were comments regarding the speed and volume of data.

We will need to ensure that any system supports Registrars of all sizes and will respond in near real-time. As we progress with these proposals, we will give additional consideration to the suggestion of providing an FTP/File-based reports tool which would provide a daily CSV report of Domains per Tag and related domain data for the registrar.

UKRAC RESPONSE TO PROPOSALS 6 & 7

The UKRAC supports Proposal 6 & 7

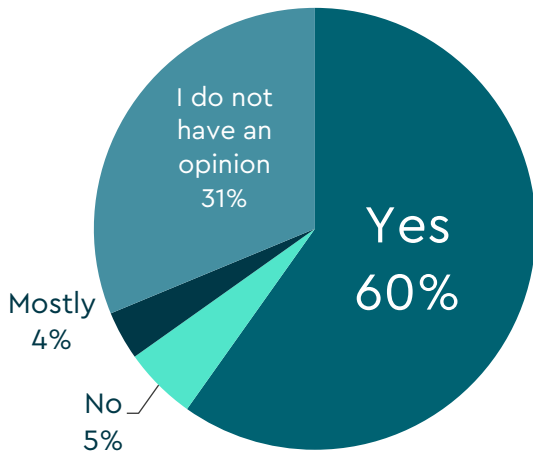
UKRAC members do use LIST

There are issues currently on using WDM or EPP to use the equivalent of the LIST API (WDM timeouts for example). The replacement should be designed to improve not just replace the LIST API.

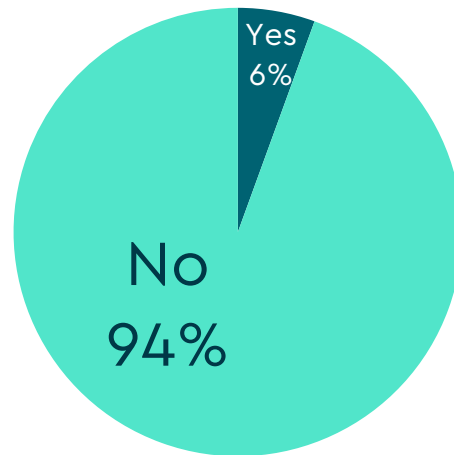
Proposal 6	Recommendation
<p>We propose to retire the LIST REST API and replace it with a credentialled Reverse Search RDAP equivalent.</p>	<ul style="list-style-type: none"> • Provide a testbed implementation of Reverse Search RDAP that replaces the LIST REST API at least 3 months before transitioning .UK to the RSP platform. Identify the provision date on the project plan. • At the time of transition to the new platform a Reverse Search RDAP implementation will replace the LIST REST API.
Proposal 7	Recommendation
<p>We propose to retire the LIST SOAP API and replace it with a credentialled Reverse Search RDAP equivalent.</p>	<ul style="list-style-type: none"> • Provide a testbed implementation of Reverse Search RDAP that replaces the LIST SOAP API at least 3 months before transitioning .UK to the RSP platform. Identify the provision date on the project plan. • At the time of transition to the new platform a Reverse Search RDAP implementation will replace the LIST SOAP API.

PROPOSAL 8: WE PROPOSE TO RETIRE THE DOMAIN HEALTH API AND REPLACE IT WITH A CREDENTIALLED REVERSE SEARCH RDAP EQUIVALENT.

Do you support Proposal 8?



Do you currently use the Domain Health API?



Respondents who provided comments on this proposal clearly feel that Domain Health, in its current form, is ineffective and requires significant re-development. We agree that Domain Health can be improved but believe it has a useful role in understanding domain reputation which has an impact on both current usage and resale values.

UKRAC RESPONSE TO PROPOSAL 8

The UKRAC supports Proposal 8.

Some members have tried it but generally used the email notifications instead.

The data quality from the Domain Health service was criticised as being inaccurate so any replacement service should offer a better quality of data.

There is often a misunderstanding of the data in domain health, it is information from threat feeds which third parties utilise. Even if there is no actual abuse happening on the domain registrars have found it useful for registrants to ensure removal from feeds and an improvement to the reputation and with it the value of a domain. It is fair feedback that perhaps the messaging around Domain Health needs to be tailored to correctly position the purpose of the data.

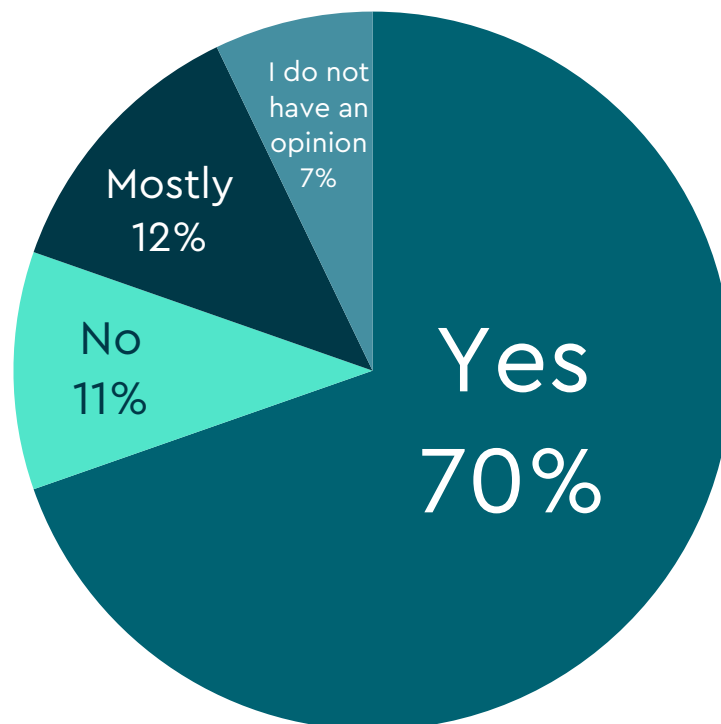
Proposal 8	Recommendation
We propose to retire the Domain Health API and replace it with a credentialed Reverse Search RDAP equivalent.	<ul style="list-style-type: none">• Provide a testbed implementation of Reverse Search RDAP that replaces the Domain Health API at least 3 months before transitioning .UK to the RSP platform. Identify the provision date on the project plan.• At the time of transition to the new platform a Reverse Search RDAP implementation will replace the Domain Health API.• After the point of transition to the RSP platform look to develop Domain Health further.

.UK standardisation

In this section we set out proposals to make changes to the Tag types to remove the functional differences between Tag types, enable the same functionality for all Registrars and the standardisation of the associated lexicon to reduce complexity for Registrars and Registrants. In addition, we proposed a new inter-registrar transfer process which is used in the basic EPP standard and is a pull process. In this section we also proposed a .UK Inter-registrar transfer policy.

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.

Do you support Proposal 9?



Almost 90% of respondents expressed a degree of support or did not have an opinion on Proposal 9. However, where concern was expressed this related to how much development they perceived would be required to remove the different TAG types. While we did not indicate a timeline for when this proposal may be implemented some stated that the timeline was too short – perhaps assuming that the timeline would be in line with the retirement of legacy services. We have not proposed this and would need to consider a suitable timeframe in line with registrars' expectations of testing and implementation. Some respondents, who under the current TAG types are not able to change the registrant of a domain name, were supportive and felt the current differences in functionality were problematic for them. Others noted that their customers expect their registrar to be able to provide all the services without the need to engage Nominet.

Conversely others thought removing the differentiation diluted their perceived value as an Accredited Channel Partner (ACP) and that this serves as a useful tool for registrants to choose a registrar. Others were of the view that the average registrant has no concept of what a TAG is or the differences between them.

There were comments regarding compliance and whether it was fair to impose additional compliance requirements on registrars who are not ACPs. Others had the opposite concern citing a reduction in compliance requirements e.g. not requiring adequate insurance having unintended consequences for registrants.

Whether registrants would be able to complete an inter registrar transfer with Nominet was raised as this was deemed to be important functionality in instances where there may be an issue with the registrar. There is no intention to remove Nominet as a backstop for registrants to rectify issues that may arise with their registrar, particularly where a registrar is in breach of policy or of the Registry-Registrar Agreement (RRA).

There was a concern about this proposal leading to gaming of the system if there was no limit on the number of tags a registrar was able to have. Nominet was encouraged to restrict the number of EPP logins.

UKRAC RESPONSE TO PROPOSAL 9

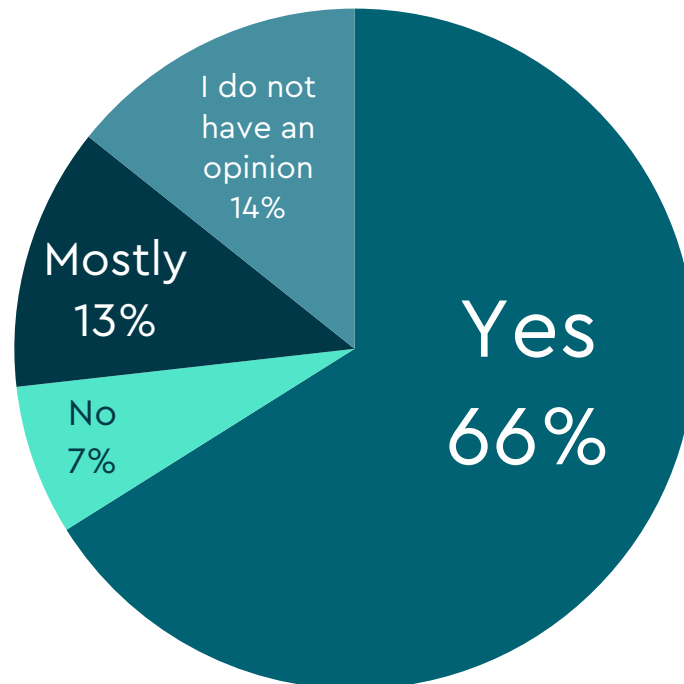
The UKRAC supports Proposal 9.

Care should be taken not to disadvantage any one type of registrar (as defined in old system). Nominet should take care to ensure that individuals as well as businesses are able to access the service.

Proposal 9	Recommendation
<p>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.</p>	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed.• Review the current Registry-Registrar Agreement (RRA) for .UK and publish a proposed draft replacement RRA for public comment which removes the distinction of TAG types.• The new RRA should come into force after review of feedback from the RRA public comment period and at the point of transition to the RSP platform.

PROPOSAL 10: WE PROPOSE ADOPTING AN UPDATED LEXICON FOR .UK AS PART OF THESE OVERALL PROPOSALS AS SET OUT IN THE CONSULTATION DOCUMENT.

Do you support Proposal 10?



Updating the lexicon with more standard terminology was supported by the majority of respondents. Some felt that "accredited registrar" doesn't really have meaning and that if used "accredited" should mean something – e.g. greater compliance or a defined accreditation process.

We recognise that the term "accredited" has multiple interpretations and that it is perhaps confusing the intent of this proposal which is to ensure that the terminology used is simple and easy for registrars and registrants to understand. We accept the suggestion that unless it is widely understood and adopted, there will continue to be a lack of understanding and use of different terminology.

There were a small number of comments that "TAG" is widely used and understood within the industry.

In adopting an updated lexicon, we will need to ensure definitions are clear and communicated to all registrars and registrants.

UKRAC RESPONSE TO PROPOSAL 10

The UKRAC MOSTLY supports Proposal 10.

For 25 years .uk registrars have used the term "TAG". It will take a considerable amount of time for them to get used to having just a "EPP client ID". UKRAC members also expressed concern that the benefits to Registrars being able to use multiple TAGS for security, brand identity and portfolio segmentation might be lost and want this ability to be maintained under new system.

We have not made any proposals to amend the number of existing TAGs any registrars have.

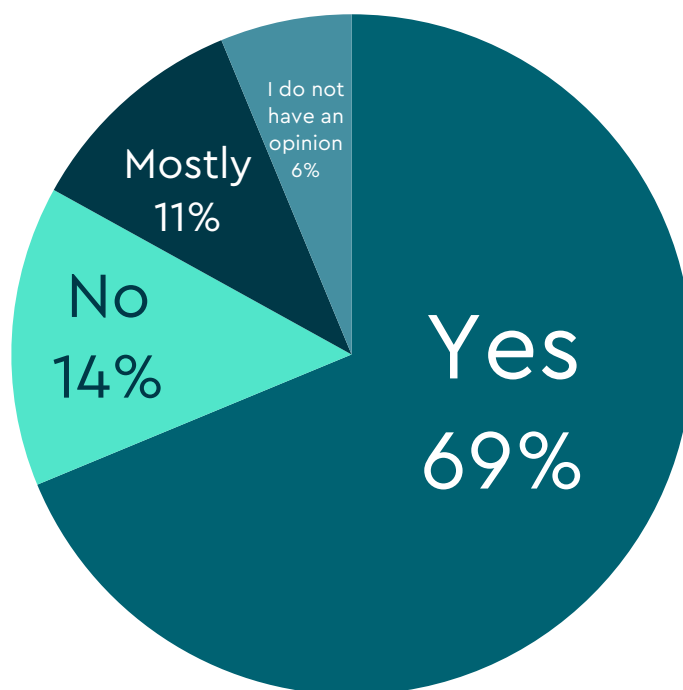
Proposal 10	Recommendation
<p>We propose adopting an updated lexicon for .UK as part of these overall proposals as set out in the consultation document.</p>	<ul style="list-style-type: none">• Proceed as proposed but use 'Registrars' rather than 'Accredited Registrars'• 'TAG' will be referred to as an 'Accreditation'.• 'Transfer' (of registrant) will be referred to as 'Change of registrant'.• 'Transfer' will be used in relation to the Inter-registrar transfer process.• 'Accredited Channel Partner' registrar, 'Channel Partner' registrar and 'Self-managed' registrar will all be referred to as 'Registrar'.

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.

Do you support Proposal 11?



Whilst the majority of respondents support the proposal, some registrars like the current system and believe it to be superior to the proposal. They are therefore of the view that there is no need to change it. Others pointed out that the proposal did not achieve the objective of standardisation because we propose instant transfers and are not including renewal at the point of transfer. We note that RFC5731 standard defined by the IETF includes the ability to carry out transfers without renewals and it is merely ICANN defined business rules that enforce one-year renewals at the point of transfer in gTLDs. We are mindful that these proposals must work for multiple types of registrars and that some support for pull transfers was conditional on zero-year transfers. The retention of zero-year transfers recognises different Registrar business models.

There are benefits to changing to a pull transfer versus a push process. We know that there are domains that sit in what are effectively suspense accounts on transfer and cause a potential security issue for those registrants in that anyone could claim the domains. The pull transfer will eradicate these instances and add to the security profile of .UK.

As with some of the other proposals a recurring theme is a concern regarding the amount of development work registrars will be required to carry out and the possibility that a large number of changes will be required in a short timeframe.

There were suggestions on further features e.g. it should not be possible to transfer domain names past expiry date and some stated that registrars should be able to charge for transfers if they are also renewing the domain as part of the transfer process. We believe it is an important principle to allow domains to be transferred at any time and our proposals allow registrars to charge when a domain name is transferred in, whether renewing the domains or not, as that is the start of a new contractual relationship and a decision for the registrant to make.

Others advocated for Nominet to have the ability to intervene on behalf of a registrant where the registrar is non-responsive or does not provide an auth code. Nominet will continue to provide expeditious support to registrants when needed.

UKRAC RESPONSE TO PROPOSAL 11

The UKRAC supports Proposal 11.

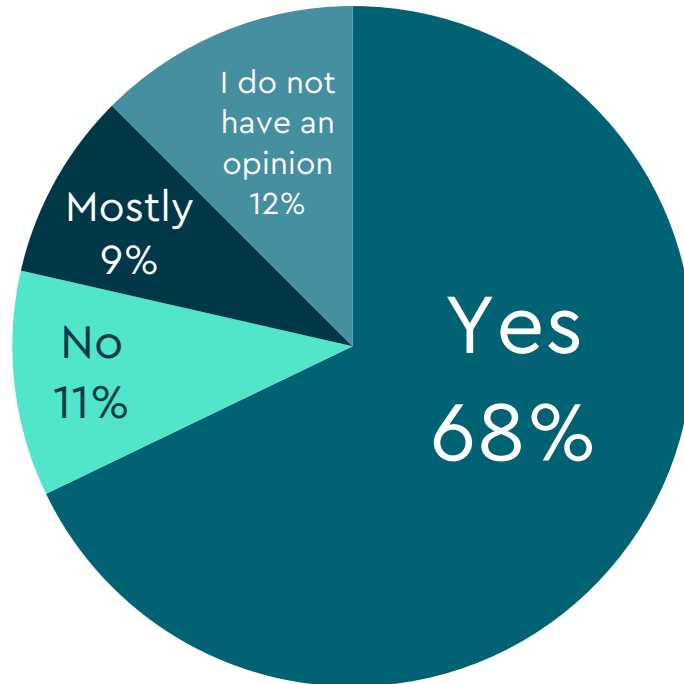
Registrars will need time to update systems to make this change. Both when using own solutions and off-the-shelf software. Nominet should monitor progress with registrars making this change to ensure there is not critical failure in the domain transfer market once changes go live.

We agree that the transition to the new platform will require a carefully orchestrated plan and engagement with registrars to ensure a smooth experience for all.

Proposal 11	Recommendation
<p>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.</p> <p>Transfers will be instant on submission of a valid transfer authorisation code to the Registry.</p> <p>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.</p>	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed.• Provide detailed support materials for registrars for both EPP and Web based systems.

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.

Do you support Proposal 12?



There was one suggestion that a 30-day authorisation code Time-To-Live (TTL) instead of 15 days would be better. From a security perspective a lower TTL is beneficial and therefore we are minded to proceed with 15 days at this point in time. We will review after implementation to understand the impact on the market of this TTL based on change data in the registry system.

UKRAC RESPONSE TO PROPOSAL 12

The UKRAC supports Proposal 12.

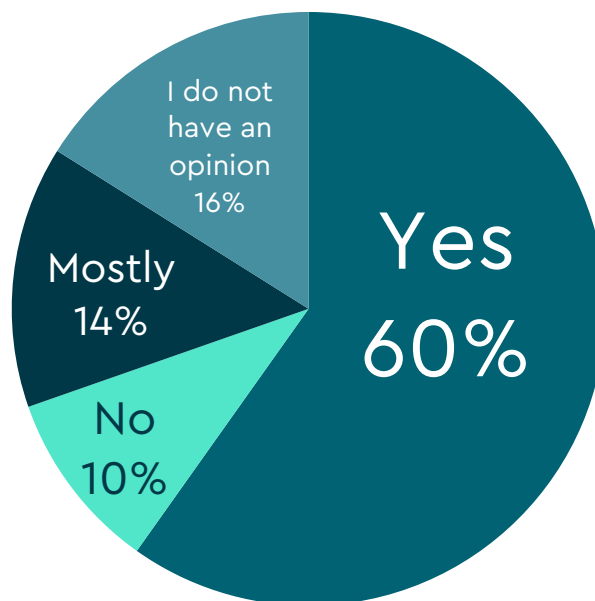
Concerns were raised over the ability to do bulk transfers being restricted. Some of the detail is out of step with current practice.

We have not proposed restricting any bulk transfers. It is true that current practice for gTLDs often does not have the complexity in Transfer Authorisation Codes but this is also one of the challenges being experienced with security in those gTLDs.

Proposal 12	Recommendation
<p>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.</p>	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed.• At the point of transition to the new RSP platform provide the ability in web interface to:<ul style="list-style-type: none">○ generate Transfer Authorisation Codes in bulk for a selection of domains on your accreditation.○ Submit bulk transfer requests with secure auth codes per domain.

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.

Do you support Proposal 13?



One of the most well-loved parts of .UK today is the instant aspect of the inter-registrar transfer process. We acknowledge that instant transfer is not the norm within the gTLD space however it is catered for in the EPP standard and instant transfer is implemented in other ccTLDs utilising EPP. The downside of the gTLD approach is that registrants must rely either on their losing registrar to approve the transfer quickly or to wait 5-days before carrying out the next steps of what is a critical configuration change on their domain names. We believe that if a registrant wishes to make critical changes to their domain they should be in control of the timing and that .UK registrants prefer domains to transfer between registrars quickly.

Nominet was encouraged to enable a registrant to obtain an emergency transfer authorisation code if a registrar was withholding this or if the registrar was unable to provide it. Where there is an issue with the registrar e.g. if the transfer is required due to the registrar ceasing to trade or the registrar is in breach of the RRA or registry policies (which require registrars to provide transfer authorisation codes) there will be support from Nominet.

One respondent questioned the proposed requirement to retain Transfer Authorisation Codes for 15 months so they can be made available to Nominet's compliance team in a transfer dispute or audit if required. Our intent is that this timeframe is acceptable under GDPR and that it ensures the ability of the legitimate registrant to dispute a transfer for a full 1-year term and provides a buffer to allow

Nominet to request the data from the registrar and the registrar to then process the request and supply it to Nominet.

One respondent was concerned about a potential abuse vector of registrants continually requesting transfer authorisation codes and would want some way of either limiting this or dealing with the issue. We believe this could be dealt with within the registrar's terms and conditions and contract with their customer in a manner that would be acceptable to our compliance team.

There was some concern that our policy wording would restrict the ability to make positive use of transfer locks for security purposes with the consent of the registrant and we will seek to address that wording. Similarly, there was concern that registrars may be forced to offer free incoming transfers which was not the intent of our wording.

There were also specific suggestions and comments pertaining to the wording of the policy which we will consider.

UKRAC RESPONSE TO PROPOSAL 13

The UKRAC MOSTLY supports Proposal 13.

Registrars are used to being able to do last-minute transfers. Changing expiry process affects this.

Auth code provision to Registrant is not the same as provision to account holder, which is how many registrars' work. Policy should spell this out. For example, "Provision of code to account holder should be allowed with the provision it may only be requested at the request of registrant."

Retention of date for time specified is supported but may also result in system changes that registrars may overlook so good communication from Nominet about exactly what is required under this policy is essential.

Whilst account holders undoubtedly play a part registration processes, Nominet does not recognise a registrar's account holders as part of its policy principles. We believe adding account holders which we have no knowledge or details of into the policy will not be helpful for either registrants or registrars and it is a matter for the registrar to ensure their contractual framework (and enforcement) with account holders meets the needs of supply to the registrant.

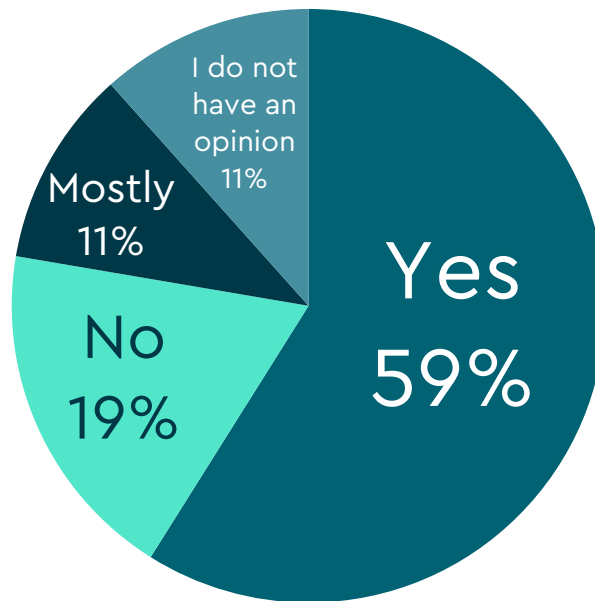
Proposal 13	Recommendation
We propose the .UK Inter-registrar transfer policy will be as defined in 'Proposed Policy 1: .UK Inter-registrar transfer policy' as set out in the consultation document.	<ul style="list-style-type: none">• We have made minor amends to Proposed Policy 1 based on feedback and included the marked-up draft in the appendix.• At the point of transition to the new RSP platform the revised policy will come into force.

.UK Lifecycle

In this section we proposed to revert to the industry standard registry auto-renew model where deletes happen when the Registrant requests them and not a point in relation to renewal. In this section we also proposed a .UK Registry-Registrar Lifecycle Policy. We also proposed a .UK add grace period limits policy. We also proposed to stop sending expiry notifications to registrants.

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.

Do you support Proposal 14?



As with other proposals the majority of respondents were in favour but the same concerns around the amount of development required, re-education of registrants, complexity of the change and whether there was any benefit to changing were expressed. In addition, there was concern that the length of the redemption grace period was too short, particularly where a registrar was investigating fraudulent domains.

One respondent suggested we do not include the need for a restore:report command in EPP as only restore:request is mandatory. We have reviewed RFC3915 and have concluded that the out-of-band mechanism permitted in the technical standard can enable us to be compliant and make use of our history data combined with a policy restriction on restoring the domain to assume rights for anyone other than the registrant.

UKRAC RESPONSE TO PROPOSAL 14

The UKRAC did not reach consensus on Proposal 14.

Currently .uk registrants are getting 90 days post-expiry to renew names. This new proposal will cut the number of days to 75 days. In fact, those 75 days will depend on two things:

(A) How long the registrar sets are their Auto-Renew Grace period which can be anything up to 45 days

(B) If the registrar implements the redemption grace period and allows a restore inside their control panel.

Whilst some members were against the shortening the lifecycle outright, others were concerned about the variation of the timing possible by different registrars causing confusion amongst registrants and impacting successful renewals.

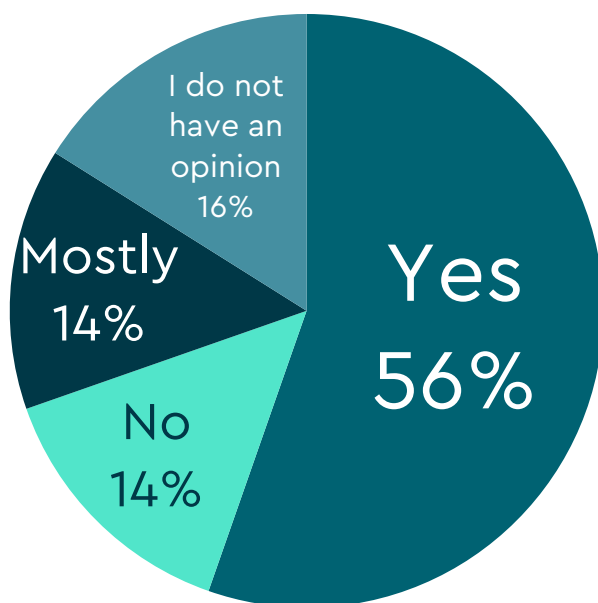
We note that proposal 14 is merely in relation to the introduction of the RFC3915 Registry Grace period mapping for EPP and the lifecycle processes, the policy and timing are contained within Proposal 15.

However, on the salient points which are relevant to the later proposal, less than 0.85% of renewals currently happen after 75-days, and 48% of those are on self-managed TAGs where the registrar will be in full control and knowledge of the timings, leaving a potential impact on 0.442% of renewals potentially experiencing a shorter lifecycle and not expecting that timeframe. We note that this reduction is generally to the point in the lifecycle in which the domain does not resolve, the domain is unpaid for and the registry is offering a service for no charge.

Proposal 14	Recommendation
We propose introducing RFC3915 Domain Registry Grace Period mapping for EPP and the associated new lifecycle process as set out in the consultation document.	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed.

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.

Do you support Proposal 15?



Whilst there was still a majority of respondents in favour of this proposal the proportion of respondents who 'mostly' supported or did not support was higher than with other proposals.

This was mainly because respondents did not see any benefit to the change and believed a reduced amount of time for registrants to renew their domain was detrimental. The proposal seeks to reduce the lifecycle post expiry from 90 days to a maximum of 75 days. 0.85% of renewals are made in this 15-day window of which 48% are on self-managed tags therefore it is understandable that this concern would be expressed by secondary market registrars who are also registrants.

Nominet will need to look at what information it can provide to registrars to ensure they can implement the new lifecycle and educate their customers so that registrants do not inadvertently lose their domains.

The proposed policy states that 'A Registrar must not renew a domain without the explicit consent of a Registrant' and some respondents suggested Nominet should set out clearly to registrars what explicit consent means.

Registrars would like to be able to apply a transfer lock particularly where they are investigating instances of suspected fraud. We believe this is possible, but registrars would need to ensure this was covered by their terms and conditions and contract with the registrant.

UKRAC RESPONSE TO PROPOSAL 15

The UKRAC supports Proposal 15.

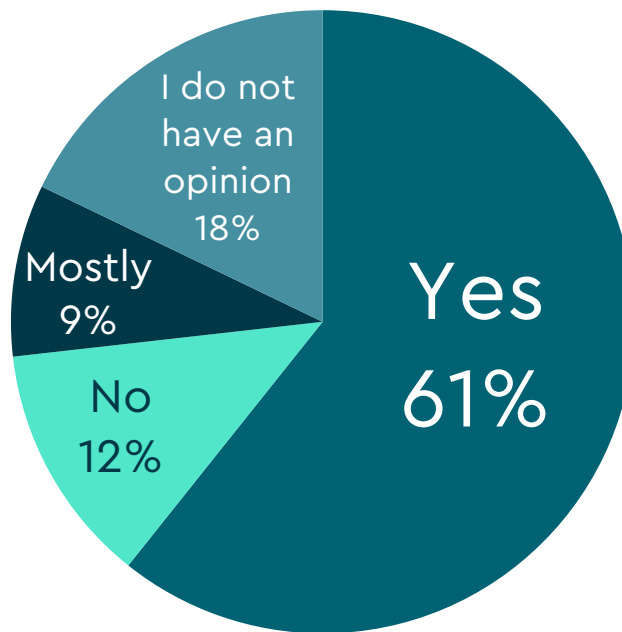
Some registrars disagreed with policy 8c (Restore without fees).

It should be noted that the policy does not require "Restore without fees" for registrars; it requires no additional charge other than outstanding renewal fees. This is a critical difference in meaning in relation to domains post-expiry.

Proposal 15	Recommendation
<p>To support the new technical lifecycle, we propose adopting 'Proposed Policy 2: .UK Registry-Registrar Lifecycle policy' as set out in the consultation document.</p>	<ul style="list-style-type: none">• We have made minor amends to Proposed Policy 2 based on feedback and included the marked-up draft in the appendix.• At the point of transition to the new RSP platform the revised policy will come into force.

PROPOSAL 16: WE PROPOSE ADOPTING 'PROPOSED POLICY 3: .UK ADD GRACE PERIOD LIMITS POLICY' AS SET OUT IN THE CONSULTATION DOCUMENT.

Do you support Proposal 16?



One respondent suggested that Nominet may be taking a backward step in adopting this policy as there is discussion in the wider industry with registrars suggesting changes to the Add Grace Period (AGP) Limits policy. We note that this discussion does not appear to be getting traction within ICANN circles as it relates to fraud rather than mistakes.

It was suggested that registrars should be able to get a refund on domains where they can show evidence of abuse. The policy Nominet has proposed goes further than current ICANN AGP Limits Policy and states that if during the grace period the registrar identifies abuse and deletes the domain we will allow those domains to be exempted from the limits on refunds. Nominet already works co-operatively with registrars on individual cases of fraud, and we do not believe additional policy is needed beyond the AGP period.

UKRAC RESPONSE TO PROPOSAL 16

The UKRAC supports Proposal 16.

UKRAC noted the higher limits may result in an increase in "domain tasting".

Proposal 16	Recommendation
<p>We propose adopting 'Proposed Policy 3: .UK add grace period limits policy' as set out in the consultation document.</p>	<ul style="list-style-type: none">• At the point of transition to the new RSP platform the revised policy will come into force. We have included the draft policy in the appendix.• Nominet will monitor the active usage of the new grace period limits to influence future policy development.

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.

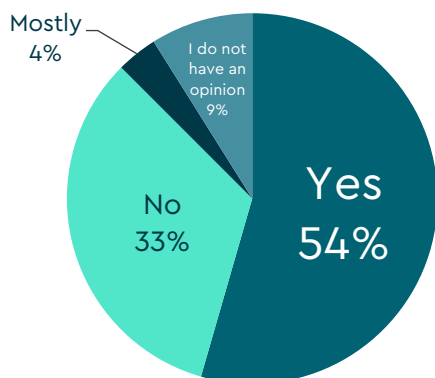
PROPOSAL 18: UNDER THE NEW OPERATIONAL MODEL, NOMINET WILL NO LONGER BE ABLE TO DETERMINE WHEN 7 DAYS BEFORE SUSPENSION IS AND THEREFORE WE WILL NO LONGER NOTIFY REGISTRANTS.

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.

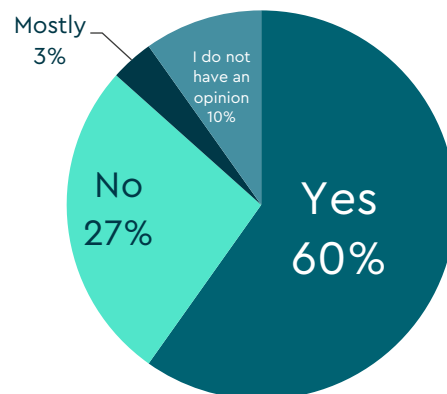
PROPOSAL 20: WE PROPOSE THAT UNDER THE NEW OPERATIONAL MODEL, NOMINET WILL NO LONGER SEND AN EMAIL TO A REGISTRANT 7 DAYS BEFORE A DOMAIN CEASES TO BE RESTORABLE.

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

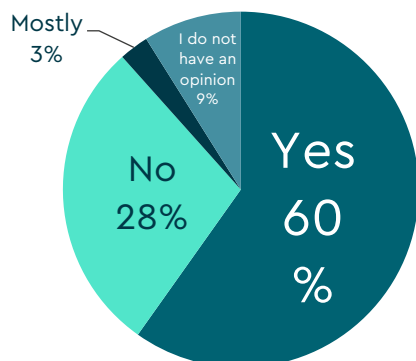
Do you support Proposal 17?



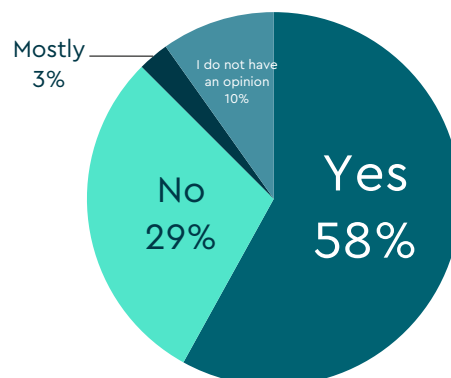
Do you support Proposal 18?

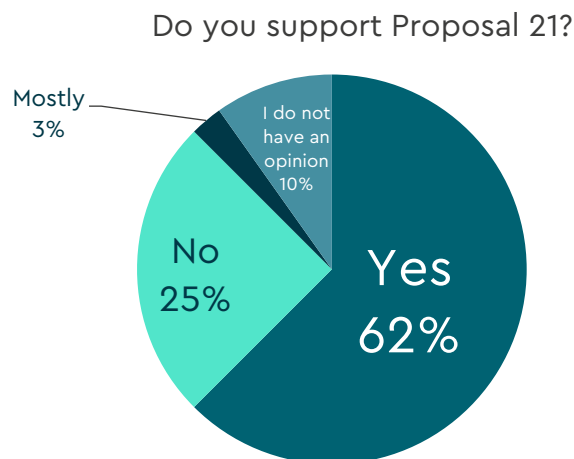


Do you support Proposal 19?



Do you support Proposal 20?





Whilst the majority of respondents supported these proposals, there were also a high number of objections in comparison other proposed changes set out in the consultation.

There was evident confusion expressed in the responses regarding whether Nominet would continue to send registrars expiry notifications. Nominet intends to continue to notify registrars of domains that are expiring.

The proposed change to the lifecycle creates challenges for Nominet in sending expiry notifications directly to the registrant. The renewal process is instigated by the registrant with the registrar and Nominet would have no visibility of this process. Nominet sending a notification to the registrant, regarding domain expiry may cause confusion and create support queries for registrars.

Similarly, it would be impossible for Nominet to send an email to the registrant 7 days prior to the registrar issuing a delete command as Nominet has no visibility of when the command will be sent.

We take on board the concerns that registrants may be at risk of losing domains because they will not be aware that renewal is due. Some respondents suggested that there is a lack of consistency amongst registrars as to whether notifications are sent and that it would be in registrants' best interests to not solely rely on the registrar sending notifications.

Whilst we believe that the majority of registrars would be motivated to encourage their customers to renew, we appreciate that sometimes communication breaks down. We are sympathetic to this and will consider whether we continue to send one notification to the registrant at the point the domain enters the redemption period.

UKRAC RESPONSE TO PROPOSALS 17, 18, 19, 20 & 21

The UKRAC MOSTLY supports proposal 17.

Members said that making this optional for registrars to turn on or off would be beneficial.

The UKRAC MOSTLY supports Proposal 18

Nominet could still notify a registrant 7 days before the RGP period which technically does the same as suspend the name from zone file. Nominet could give the registrars the ability to turn that on and off per registrar.

The UKRAC MOSTLY supports proposal 19.

Explaining to a registrant that a domain has entered pending delete status is useful to the registrar. The name cannot be recovered now. Nominet could give the registrars the ability to turn that on and off per registrar.

The UKRAC MOSTLY supports proposal 20.

Nominet could give the registrars the ability to turn that on and off per registrar.

The UKRAC MOSTLY supports proposal 21. Nominet could give the registrars the ability to turn that on and off per registrar.

In relation to proposal 18 it seems clear that there is confusion in understanding the lifecycle process. Under the EPP standard the point in time where a domain is 'suspended' is the start of redemption period which happens when a registrar sends the delete command. We cannot predict 7-days ahead when a registrar will send the delete command.

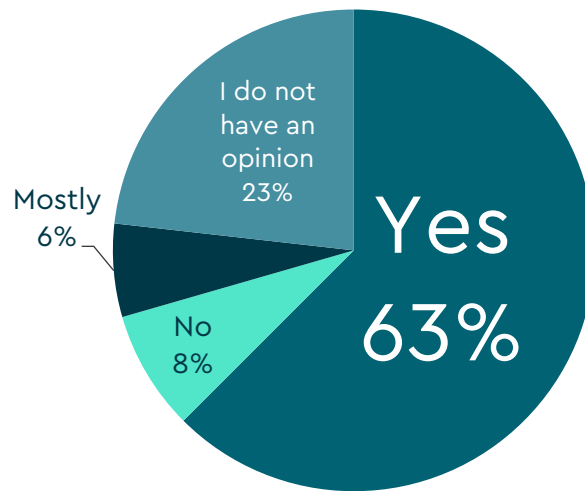
Proposal 17	Recommendation
<p>We propose that under the new operational model, Nominet will no longer send an email to a Registrant at expiry reminding them to renew the domain.</p>	<p>Based on feedback we have amended our approach as follows:</p> <ul style="list-style-type: none"> • For registrars who choose an auto-delete configuration instead of auto-renew send expiry notification to the registrant at the time of expiry. • For registrars who choose auto-renew model allow the registrar to choose whether expiry notifications are sent at the time of expiry.
Proposal 18	Recommendation
<p>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.</p>	<ul style="list-style-type: none"> • At the point of transition to the new RSP platform proceed as proposed as it is impossible to predict the registrars timing of sending the delete command.
Proposal 19	Recommendation
<p>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.</p>	<p>Based on feedback we have amended our approach as follows:</p> <ul style="list-style-type: none"> • When a domain enters redemption period with the pending delete state send a notification to the registrant.
Proposal 20	Recommendation
<p>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.</p>	<p>Based on feedback we have amended our approach as follows:</p> <ul style="list-style-type: none"> • 7 days before a domain ceases to be restorable notify the registrant.
Proposal 21	Recommendation
<p>We propose that under the new operational model, Nominet will no longer send an email to a Registrant when a domain is purged.</p>	<ul style="list-style-type: none"> • At the point of transition to the new RSP platform proceed as proposed.

Investigation lock

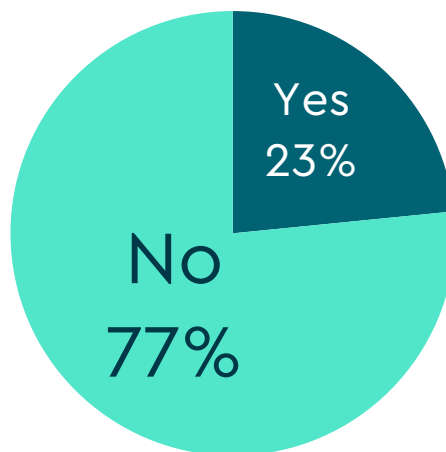
In this section we propose to remove the investigation lock and enable registrars to utilise EPP client statuses to achieve the same result. We also asked for feedback on whether registrars would welcome being able to give a reason for the locks which would be visible to others and would provide transparency to registrars who may be asked to accept the domain transfer and visible in RDAP.

PROPOSAL 22: WE PROPOSE REMOVING NOMINET'S BESPOKE INVESTIGATION LOCK AND INSTEAD REGISTRARS SHOULD UTILISE EPP CLIENT STATUSES TO ACHIEVE THE SAME RESULTS.

Do you support Proposal 22?



Do you currently use Investigation Lock for domain name abuse management in .UK?



The majority of respondents do not use the investigation lock and are supportive of the proposal to remove it. One respondent suggested they would like both options but acknowledged it made little sense to retain it given so few registrars appeared to be using it.

UKRAC RESPONSE TO PROPOSAL 22

The UKRAC supports Proposal 22.

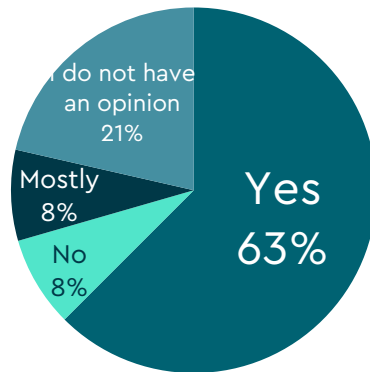
UKRAC are concerned about registrars imposing transfer locks on newly registered domains similar to ICANN policy on gTLDs and Nominet should make clear this is not permitted.

Transfer locks are an incredibly important part of the security of a top-level domain, we disagree that they should not be permitted but we also agree that it must not be mandated against a registrants will except where the registrant is being investigated for DNS abuse or other non-conformance with registry policies.

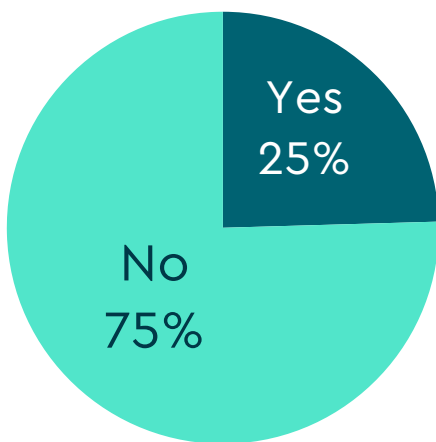
Proposal 22	Recommendation
We propose removing Nominet's bespoke Investigation lock and instead Registrars should utilise EPP client statuses to achieve the same results.	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed.

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.

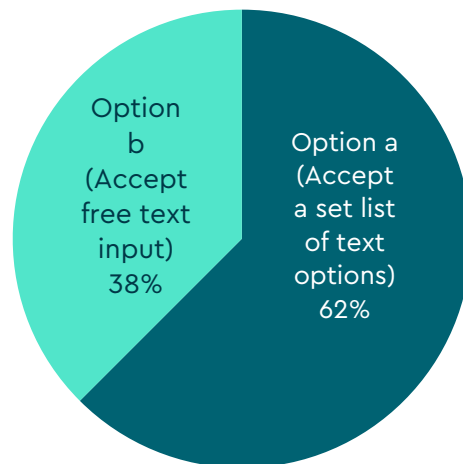
Do you support Proposal 23?



Do you currently use EPP client status for domain name abuse management in .UK?



If Proposal 23 was implemented would you prefer option a or option b?



Respondents preferred to choose from a list of options rather than have free text input. Some were not entirely supportive of the proposal as it was not standard, and one suggested it was not compatible with IETF standards. RFC5731 defines the implementation method we proposed providing an example taken directly from the RFC is as follows:

```
<domain:status s="clientHold" lang="en">Payment overdue.</domain:status>
```

UKRAC RESPONSE TO PROPOSAL 23

The UKRAC supports Proposal 23.

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?

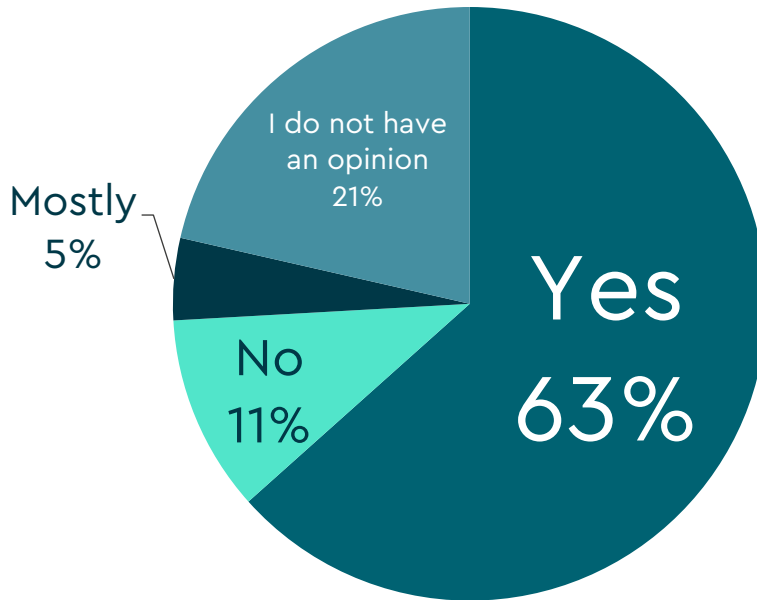
No consensus reached by UKRAC.

Main comment was that Proposal 23 should be optional.

Proposal 23	Recommendation
<p>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.</p>	<ul style="list-style-type: none">• Review existing responses and develop a product discussion paper for implementation of option A or B with details to enable further input.• At the point of transition to the new RSP platform extend the EPP statuses functionality to allow optional inclusion of reasons.

PROPOSAL 24: WE PROPOSE TO ALLOW THE PROPOSED NEW STATUS REASONS TO BE VISIBLE IN EPP AND WEB DOMAIN MANAGER FOR NON-SPONSORING REGISTRARS.

Do you support Proposal 24?

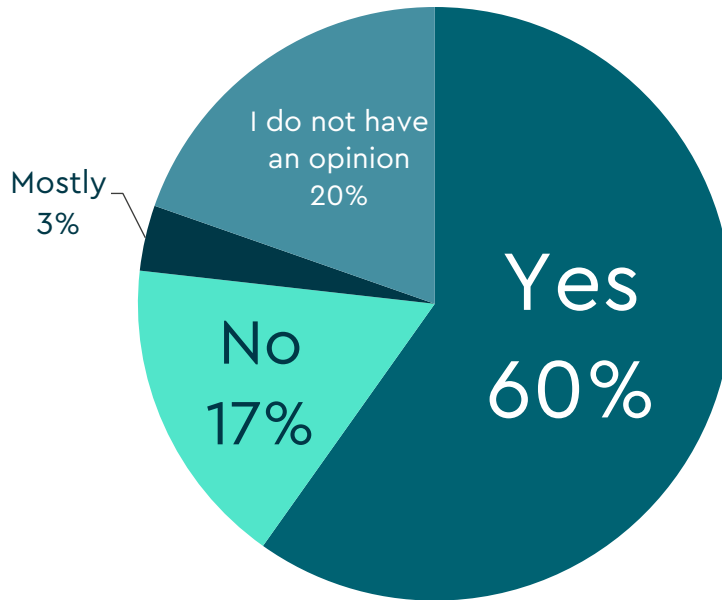


The majority of respondents supported the proposal but there was some concern expressed over the publication of what could be deemed to be private information or perceived reputational damage.

Proposal 24	Recommendation
We propose to allow the proposed new status reasons to be visible in EPP and Web Domain manager for non-sponsoring Registrars.	<ul style="list-style-type: none">Review existing responses and include updated proposals in the product discussion paper referenced in proposal 23.

PROPOSAL 25: WE PROPOSE TO ALLOW THE PROPOSED NEW STATUS REASONS TO BE VISIBLE IN RDAP TO ANY PUBLIC USERS.

Do you support Proposal 25?



The majority of respondents supported the proposal but there was some concern expressed over the publication of what could be deemed to be private information or perhaps perceived reputational damage.

UKRAC RESPONSE TO PROPOSAL 25

The UKRAC supports Proposal 25.
perhaps the Option A is safer.

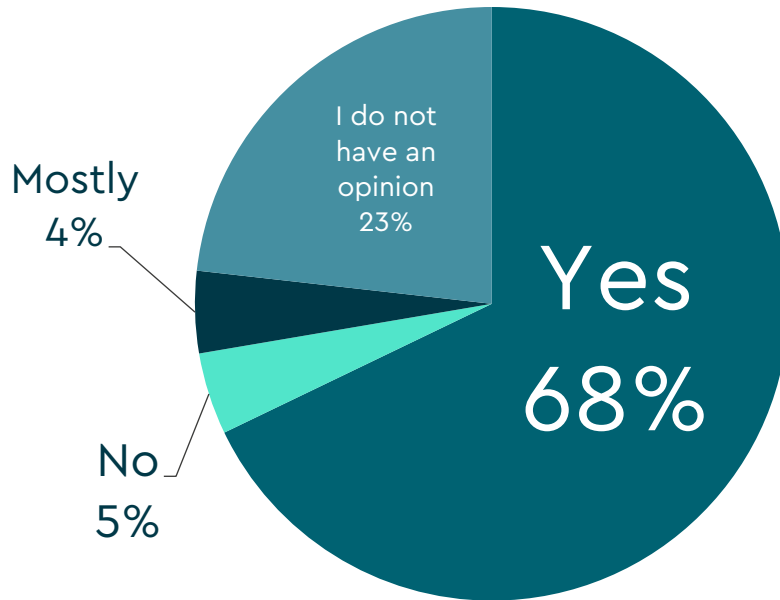
Proposal 25	Recommendation
We propose to allow the proposed new status reasons to be visible in RDAP to any public users.	<ul style="list-style-type: none">Review existing responses and include updated proposals in the product discussion paper referenced in proposal 23.

Registrars who are not members

In this section we proposed to standardise the registration periods for non-member Registrars to align with the standard registration periods.

PROPOSAL 26: WE PROPOSE TO AMEND NON-MEMBER REGISTRATION AND RENEWAL PERIODS TO MATCH THE MEMBER PERIODS I.E. 1 TO 10 YEARS.

Do you support Proposal 26?



No comments of substance were received on the proposal in relation to registration and renewal periods of 1 to 10 years, but some respondents hold the view that to be a registrar you should also be required to be a member.

UKRAC RESPONSE TO PROPOSAL 26

The UKRAC does not support proposal 26.

Members of the UKRAC suggested non-members should not be able to be registrants at all. Nominet should encourage direct registrants to move to Registrars when communicating this change to the affected Registrants. If they still want to manage domains directly, then they can become members.

Nominet will see cost and support savings as a result.

There are currently 197 non-member registrar TAGs, 89 of which have no domains under management (DUM). Of those with DUM, 11 are councils managing their .sch.uk domain portfolio. When we exclude the NOMINET TAG the total number of domains on non-member TAGs is 3080. Based upon this feedback and the data we are minded to review our options further.

Proposal 26	Recommendation
We propose to amend non-member registration and renewal periods to match the member periods i.e. 1 to 10 years.	<ul style="list-style-type: none">• Review the suggestion of removing non-member TAGs in more detail.<ul style="list-style-type: none">○ If a review results in retaining non-member TAGs at the point of transition to the new RSP platform proceed as proposed.○ If a review results in removing non-member TAGs at the point of transition to the new RSP platform or before transition domains to member TAGs.

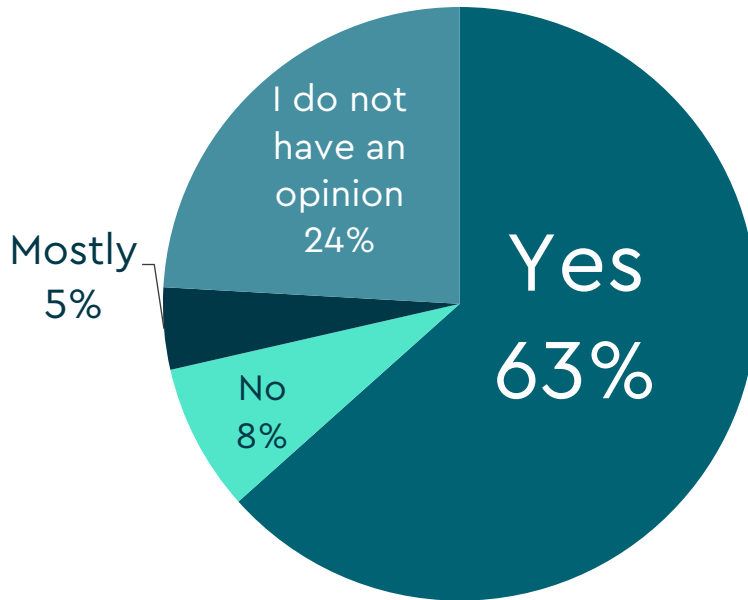
Additional technical changes to EPP and registry fields

In this section we proposed changes to:

- Time – to increase the timestamps in EPP
- RFC5731: Domain objects – propose to update the EPP Domain info command to include additional data not currently available in EPP
- RFC5732: Host objects – allow a host object to have multiple IPv4 and/or IPv6 addresses and expanding the data available in an EPP query response to the host info command
- RFC5733: Contact objects – expand the data returned in EPP query response to the contact info command.
- RFC8543: Organisation mapping and RFC8544: Organisation Extension – proposal to introduce organisation mapping objects to the registry and associated linkage to existing object types to replace reseller fields
- Proxy Services Framework: Proposal to use RFC8543 and RFC8544 to record proxy information
- Domain cancellation which is not as a result of expiry: add a redemption grace period for domains which are cancelled anytime outside of the add grace period.

PROPOSAL 27: WE PROPOSE ADOPTING THE DOCUMENTED IMPLEMENTATION FOR DOMAIN OBJECT.

Do you support Proposal 27?



Some of the comments indicated that respondents were not clear on the potential impact of this proposal and Nominet will need to provide further explanation regarding this.

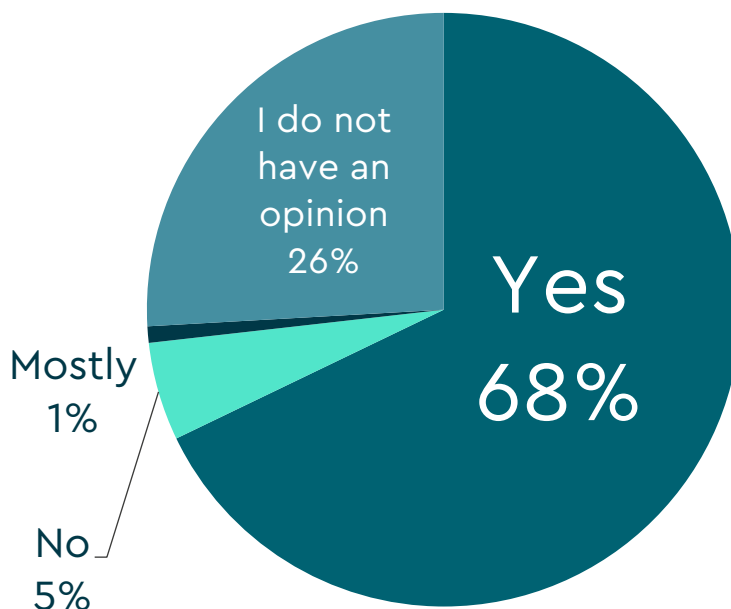
UKRAC RESPONSE TO PROPOSAL 27

The UKRAC supports Proposal 27.
Extensive registrar documentation required.

Proposal 27	Recommendation
We propose adopting the documented implementation for domain objects as detailed in the consultation document.	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed.• Provide comprehensive documentation for registrars.

PROPOSAL 28: WE PROPOSE ADOPTING THE DOCUMENTED IMPLEMENTATION FOR HOST OBJECTS AS DETAILED IN THE CONSULTATION DOCUMENT.

Do you support Proposal 28?



There were a very small number of comments with one objection to having multiple IP addresses. Whilst it is uncommon to have multiple IP addresses for a nameserver, it is certainly not unheard of and is a legitimate approach to delivering a stable DNS environment that we currently prohibit in

.UK for historical compatibility reasons alone. We believe there is a benefit of allowing multiple IPs in glue records.

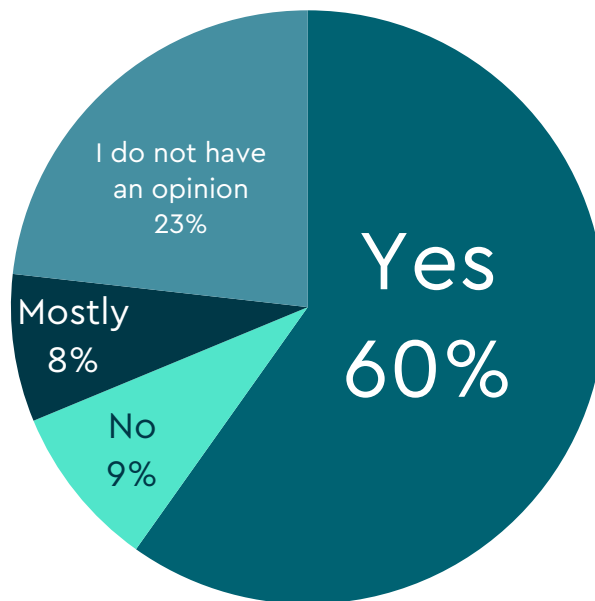
UKRAC RESPONSE TO PROPOSAL 28

The UKRAC supports Proposal 28.

Proposal 28	Recommendation
We propose adopting the documented implementation for host objects as detailed in the consultation document.	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed.• Provide comprehensive support documentation for registrars

PROPOSAL 29: WE PROPOSE ADOPTING THE DOCUMENTED IMPLEMENTATION FOR CONTACT OBJECTS AS DETAILED IN THE CONSULTATION DOCUMENT.

Do you support Proposal 29?



There was a small amount of support for retaining additional data fields, however the organisation field is already an optional field, is not commonly or consistently used and therefore the data is patchy and very unreliable.

UKRAC RESPONSE TO PROPOSAL 29

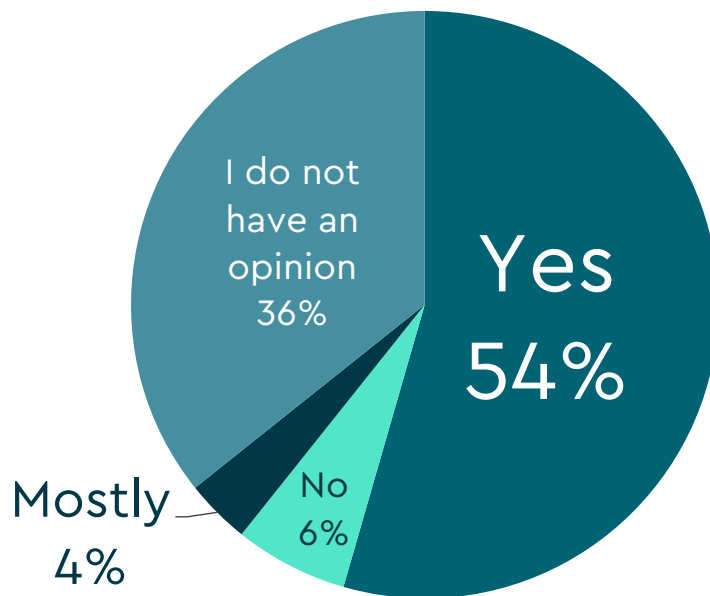
The UKRAC supports Proposal 29.
Extensive registrar documentation required.

Proposal 29	Recommendation
We propose adopting the documented implementation for contact objects as detailed in the consultation document.	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed• Provide comprehensive support documentation for registrars

PROPOSAL 30: WE PROPOSE ADOPTING THE DOCUMENTED IMPLEMENTATION FOR ORGANISATION OBJECTS AS DETAILED IN THE CONSULTATION DOCUMENT.

The proposals are to make use of RFC8543 and RFC8544 for the purposes of objects that belong to resellers of a particular registrar or contacts which are associated with a particular privacy/proxy provider.

Do you support Proposal 30?



There was some concern over the amount of development that would be required from registrars to implement this. In addition to that there were questions around the purposes of using it for privacy/proxy services using it whilst they provided the data as part of the registrant data.

Registrars who do not have resellers and do not sign up to the Proxy Services Framework will not be impacted by these proposals.

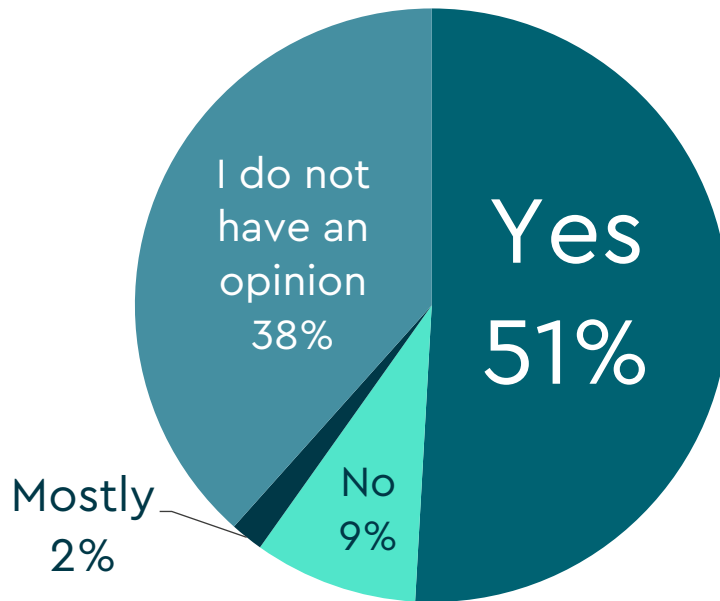
UKRAC RESPONSE TO PROPOSAL 30

The UKRAC supports Proposal 30.

Proposal 30	Recommendation
We propose adopting the documented implementation for organisation objects as detailed in the consultation document.	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed• Provide comprehensive support documentation for registrars

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.

Do you support Proposal 31?



There was one suggestion that this may require further discussion, however the very small number of comments and low level of objection suggests the majority of respondents are supportive of this proposal or do not have an opinion.

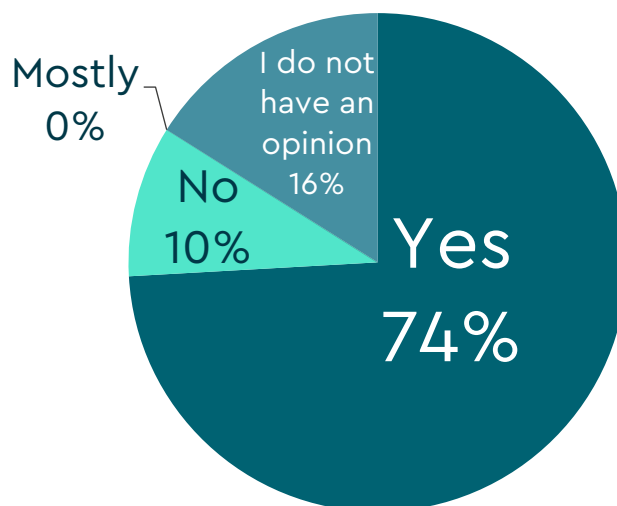
UKRAC RESPONSE TO PROPOSAL 31

The UKRAC supports Proposal 31.

Proposal 31	Recommendation
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.	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed• Provide comprehensive support documentation for registrars• Ensure the review of the RRA considers the changes to Proxy services implementation to streamline experience.

PROPOSAL 32: WE PROPOSE ADDING AN RFC3915 REDEMPTION GRACE PERIOD FOR DOMAINS WHICH ARE CANCELLED AT ANY TIME OUTSIDE THE ADD GRACE PERIOD.

Do you support Proposal 32?



There was a small number of objections due to the added complexity and a concern as to how to integrate this with external modules or platforms. The proposal received a very high level of support from the majority of respondents.

UKRAC RESPONSE TO PROPOSAL 32

The UKRAC supports Proposal 32.

Proposal 32	Recommendation
We propose adding an RFC3915 Redemption Grace Period for domains which are cancelled at any time outside the add grace period.	<ul style="list-style-type: none">• At the point of transition to the new RSP platform Proceed as proposed.• Provide comprehensive support documentation for registrars.

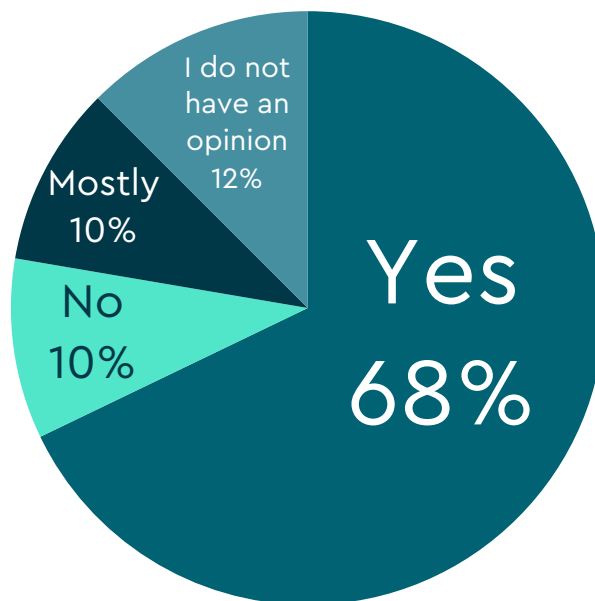
Data Quality

In this section we asked for feedback on the possibility of launching a separate industry engagement process to identify how our approach to data quality should develop. In the meantime, we propose to introduce an interim data quality policy.

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.**

Do you support Proposal 33?



Some respondents suggested that data validation should be carried out by the Registry rather than the registrar. They pointed out that the current data quality solution was bespoke to Nominet rather than being standard. Others suggested that Nominet should consider what resources it can provide to registrars (e.g. access to validation tools) in order for validation to be done in a more efficient way.

UKRAC RESPONSE TO PROPOSAL 33

The UKRAC supports Proposal 33.

If the bespoke process is removed, it is essential that the new policies allow for both international registrants and members, whose verification may be difficult/impossible. What specifically are "the needs of data quality in the .UK Registry" – this is not defined. Smaller registrars may have difficulty in meeting the new proposed approach and the previous Nominet validation process was effective for them. Nominet could provide an API to their service for registrars to use.

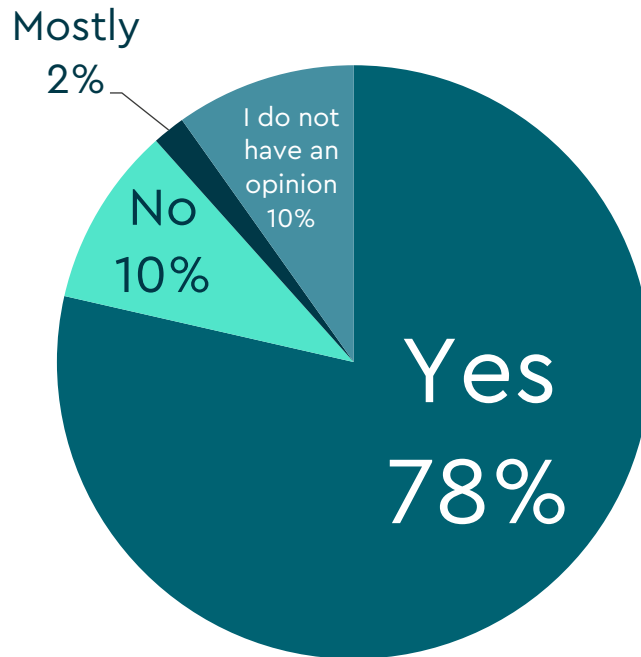
Proposal 33	Recommendation
<p>We propose to:</p> <ul style="list-style-type: none"> A. continue to expect Registrars to obtain correct and accurate data from a Registrant and supply it to the .UK Registry; and Consultation on modernisation, standardisation and legacy service retirement for .UK B. retain 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. 	<ul style="list-style-type: none"> • Proceed assuming the interim data quality policy will be retained at the point of transition to the new RSP platform until such time as a replacement policy is generated. • Plan and launch an industry engagement process on data quality issues.

Operational approach

There are some transactions and services that registrars are prevented from providing to their customers because of the bespoke nature of Nominet's systems. We propose to make changes so that registrars can offer a full service to their customers. Registrants would still be able to come to Nominet for help and assistance if they needed to escalate an issue, but we believe that this should be the exception rather than the first port of call.

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).

Do you support Proposal 34?



There was a large amount of support for this proposal but some respondents were concerned about Nominet not providing day-to-day support to registrants. In their view this is what sets Nominet apart from other Registries and is a service that is valued by both registrars and registrants.

We acknowledge this concern and want to reassure registrars and registrants that we intend to continue to provide service as a backstop where customers need help. However, it is frustrating for a registrant to request a change from their registrar to then be directed to Nominet and we believe the right approach is for registrars to be able to provide a full service to their customers.

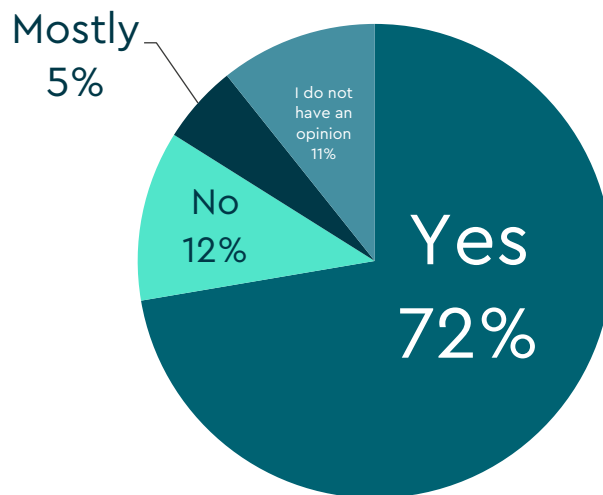
UKRAC RESPONSE TO PROPOSAL 34

The UKRAC supports Proposal 34.

Proposal 34	Recommendation
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).	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed.

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.

Do you support Proposal 35?



Some respondents did not agree that registrants should only come to Nominet for support as part of an escalation. They felt registrants should be able to request help from Nominet if they were having difficulty resolving an issue with their registrar without necessarily needing to make a formal complaint. We believe it is appropriate for registrars to be able to offer a full end-to-end service to their customers as otherwise registrars with good service are subsidising registrars with poor service via Nominet's support costs. However, we are not proposing to make the escalation process onerous. Data from escalations would be used to manage registrar compliance with the RRA.

Some felt that registrants should still be able to make changes directly at the registry rather than through their registrar. We received feedback that a registrant should be able to request a transfer authorisation directly from Nominet, rather than the registrar they are moving away from. However, this potentially enables the registrant to act outside of the rules of their contract with their registrar and adds an additional attack vector. We recognise there will be cases where Nominet will need to help a registrant obtain a transfer authorisation code quickly and efficiently, but we will also need to balance this with the need for appropriate security requirements.

There are clearly concerns around responsiveness and the shift in position of Nominet providing day to day support and effectively bypassing the registrar, to only providing support for escalated issues. Our intention with all these proposals is to improve the customer experience rather than to detrimentally impact it. Where there is a compliance issue with a registrar e.g. they refuse to issue a transfer authorisation code to their customer, Nominet can issue a transfer authorisation code if required.

UKRAC RESPONSE TO PROPOSAL 35

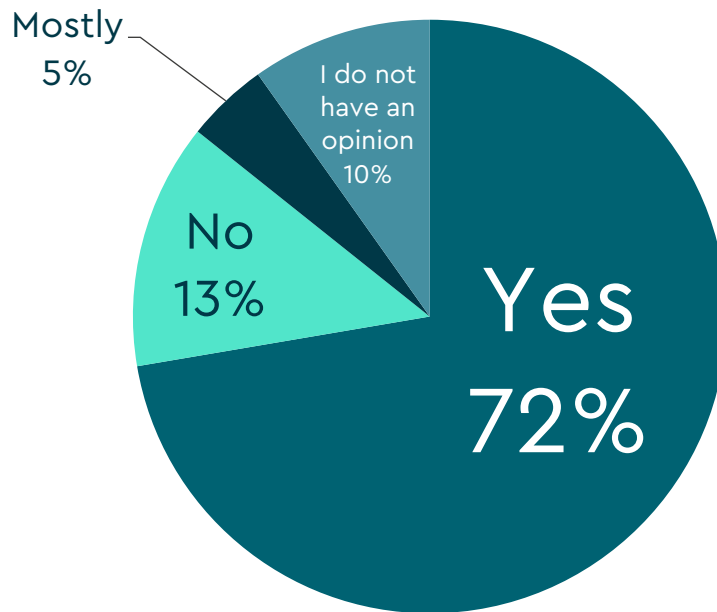
The UKRAC MOSTLY supports proposal 35.

The UKRAC would like to see more detail on Proposal 35 to fully protect registrants.

Proposal 35	Recommendation
<p>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.</p>	<ul style="list-style-type: none">• At the point of transition to the new RSP platform proceed as proposed with particular regard for ensuring registrants are not detrimentally impacted.

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.

Do you support Proposal 36?



Whilst the majority of respondents supported the proposal there was continued concern expressed over registrants only being able to contact Nominet as a last resort issue and whether Nominet will adequately deal with repeated non-compliance of registrars.

UKRAC RESPONSE TO PROPOSAL 36

The UKRAC MOSTLY supports proposal 36.

The UKRAC would like to see more detail on Proposal 36 to fully protect registrants.

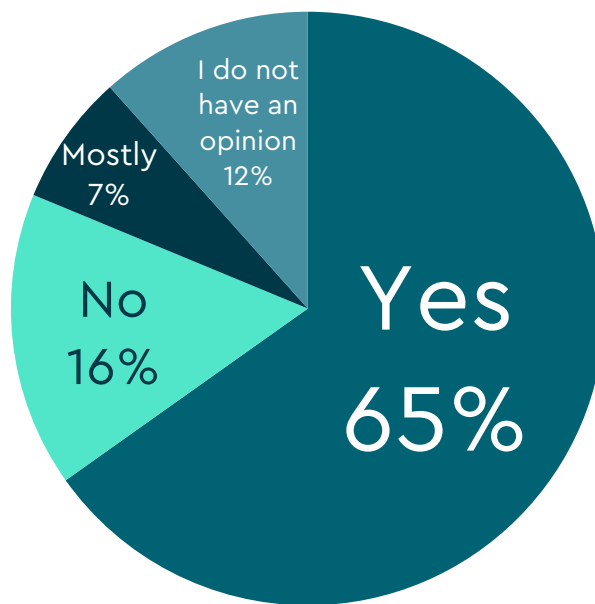
The UKRAC suggests that Nominet should ensure auth-codes are available to registrants in a timely manner, and not be delayed with a compliance process. If not, they believe there should be a clear rationale for changing this option, backed up by data on usage.

However, ensuring changes to domains are done via Registrars will help registrar systems operate without having to work with unexpected external changes to domains.

Proposal 36	Recommendation
<p>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.</p>	<p>Proceed as proposed with particular regard for ensuring registrants are not detrimentally impacted.</p>

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.

Do you support Proposal 37?



There was scepticism over how many registrants access Online Services rather than approaching their registrar. It was suggested that there was no benefit to registrants of having two access points to manage domains. Being able to make changes with the registrar and at the registry could cause confusion and sync issues.

We believe that there are benefits to registrants in retaining access to Online Services e.g. the ability to view a domain portfolio across multiple registrars and confirm their registrar has correctly configured their registrant information.

UKRAC RESPONSE TO PROPOSAL 37

The UKRAC MOSTLY supports proposal 37.

The UKRAC would like to see more detail on Proposal 37 to fully protect registrants.

The majority of UKRAC members think a separate consultation on Proposals 35-37 should take place.

Proposal 37	Recommendation
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.	Proceed as proposed

General:

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?

Registrars indicated they would need anywhere from no notice to 10 years with the majority of respondents suggesting a minimum of six months. There were requests for Nominet to provide adequate notice to registrars to allow testing and development work to be built into their existing development roadmaps. This would also allow them to plan around other major industry changes that may be taking place at the same time.

It was encouraged to provide support and documentation to registrars who may not have in-house development teams or be familiar with EPP currently.

UKRAC RESPONSE

6 Months was widely considered a bare minimum.

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?

Some feel changing systems that currently work well and are familiar to registrars is a retrograde step and can't see the benefit of changing systems. We received feedback that Nominet should provide support for registrars e.g. clear technical documentation process explanations and clear communication of the changes.

There is a desire to ensure that the implementation or retirement of services does not disrupt registrars' businesses and ability to register/transfer domains. It was suggested that the impact on registrars could be reduced by Nominet providing Software Development Kits to make implementation easier for registrars.

Respondents suggested that Nominet would need to be responsive to registrars during the testing period so that issues can be dealt with quickly and with minimal impact. In addition, a separate testing environment which performs in the same way as a PROD environment would be beneficial.

Registrars who currently use Web Domain Manager felt it was important to keep this platform.

A suggestion that came up throughout the course of the consultation and in the responses was to urge Nominet to ensure that major platforms such as WHMCS integrate with the new Registry platform.

UKRAC RESPONSE

Nominet should provide resources for registrars to help educate their customers (and staff) on the changes.

This should take a variety of forms not just a publication of the policy and technical standards, such as:

- Talking points for members to product blog posts, emails & socials to customers
 - Graphics on lifecycle etc

Online training for members

DO YOU HAVE ANY OTHER FEEDBACK ON THESE PROPOSALS THAT ARE NOT COVERED BY THIS CONSULTATION?

- Nominet was encouraged to minimise cost and effort for registrars of implementing the changes as much as possible and be flexible and responsive once implementation is underway
- With regards to the proposed policies in the consultation, respondents were keen for Nominet to ensure these were enforced through appropriate compliance activity
- Some have concerns that the proposals will have a greater and detrimental impact on smaller registrars
- There was concern about the longevity of Nominet
- Some respondents would prefer Nominet to retain TAGs
- Concern over the potential reduction in the level of support Nominet would offer to registrants
- Proposal that the changes are made incrementally
- Technical implementation suggestions
- Suggestion to consider reviewing Domain Health and providing registrars and registrants with better tools to manage fraud and abuse

UKRAC RESPONSE

.ltd.uk / .plc.uk domains are not covered.

We did not restrict our proposals to either second level or specific third level domains and .ltd.uk and plc.uk are covered by the proposals.

We take on board the concerns raised regarding implementation and the potential impact on registrars of these proposals and Nominet is committed to supporting registrars through this transition.

We will endeavour to:

- Provide comprehensive support documentation for registrars.
- Provide adequate notice for availability of testing environments and for transition.
- Continue to engage with existing code library/platform providers and/or consider the provision of open-source options.
- Continue to engage with registrars and stakeholders.

DO YOU HAVE ANY OTHER SYSTEM FEATURE REQUESTS FOR FUTURE CONSIDERATION?

The suggestions are listed below, and we will review in due course.

<p>We prefer one EPP interface for all domain extension offered by NOMINET.</p> <p>Why?</p> <ol style="list-style-type: none">1. This saves the programming and other costs of registrars.2. This saves the time of the registrars
<p>Please work to reinstate the automaton to reintroduce the security benefits it offered with such lower overheads than the proposals require</p>
<p>ability to prove domain control/ownership using hash/crypto signatures.</p>
<p>Whois history for Incident Response teams, chargeable would be fine.</p>
<p>Registry lock temporary unlock period is too short. As a corporate registrar there are multiple teams involved in a temporary unlock which different teams required for customer approval, unlocking and modification order raising and completion. It can be difficult for the teams to co-ordinate to get the modification completed within the 20 minutes the domain is unlocked for. A 2 to 4 hour window would be more beneficial for us.</p>
<p>In the web domain manager, I'd like to be able to remove the name servers for more than one domain in bulk - this is currently not possible.</p>
<p>Please consider the size and length of surveys in the future. It makes me think that you aren't taking this seriously and are simply trying to wear people down.</p>
<p>EPP syntax errors should report where the error is. We have in the past been left having to guess when sending perfectly well-formed frames that have been rejected in this way.</p>
<p>At this moment in time, the changes proposed are more than sufficient, but it would be great to be asked this question again in 2 years time to gauge what may have been missed or what may be required.</p>
<p>Suggestions for WDM interface that I have previously provided. Certain I could think of plenty but would need to include screenshots and mockups.</p>
<p>Ability to check current balance through EPP. I am integrated with other registries that allow this; eg. <?xml version=""1.0"" encoding=""UTF-8"" standalone=""no""?> <epp</p>

```
xmlns=""urn:ietf:params:xml:ns:epp-1.0">  
<command>  
<info>  
<balance:info xmlns:balance=""https://www.nic.ch/epp/balance-1.0""/>  
</info>  
<clTRID>ABC</clTRID> </command>  
</epp>
```

I would like to see a second end point and a drop pool for expired domains

A nicer way to handle 10 year renewals which doesn't rely on waiting until the last possible minute to send the renew command because domains cannot be valid for more than 10 years and 0 days.

I should be able to send the renewal command in advance and have the registry sort itself out once it reaches the appropriate date.

This causes a lot of confusion with registrants and meant that we stopped offering 10 year renewals in the end.

A separate system for expired domains

an EPP query to get your nominet balance/invoice amount(s)

Please keep using the web - for access to all of Nominet's internal systems - as Tim Berners Lee invented the bloody thing to do!

Thank you!

overall registration procedures should be aligned with gltlds for ease.

UKRAC RESPONSE

A drop pool with a separate contract and O&TE testing.

Conclusion

We would like to thank all stakeholders for their participation in this consultation and for the valuable feedback provided and have updated our recommendations in direct relation to that feedback.

We have already completed the following changes:

- Closed new applications to the DAC.
- Removed the limitations on the EPP Check command.

In the coming months over the summer we will start to:

- Create a project plan including a public version, with timings of proposed service changes.
- Plan the implementation of each of the new build elements and their interaction with services that are being terminated to ensure a smooth transition experience can be maintained for end users across the complex registry-registrar environment.
- Review third-party integration tools as to compatibility options for registrars to use.
- Start to generate Reverse Search RDAP technical specifications for product paper for registrar comment.
- Review the RRA and interactions with wider policies that apply to .UK and plan the next steps for registrar comment.
- Start to generate a product paper on the optional updates to the EPP Status commands for registrar comment.
- Identify the required educational materials for registrars and registrant.
- Start to build a communications plan to match the project plan ensuring a smooth transition.

The board will review the wider project plan in the early autumn after which we will be enabled to announce the next steps.

Appendix – updated policy drafts

Based upon the feedback received we have updated the policy drafts which are included with mark-up below.

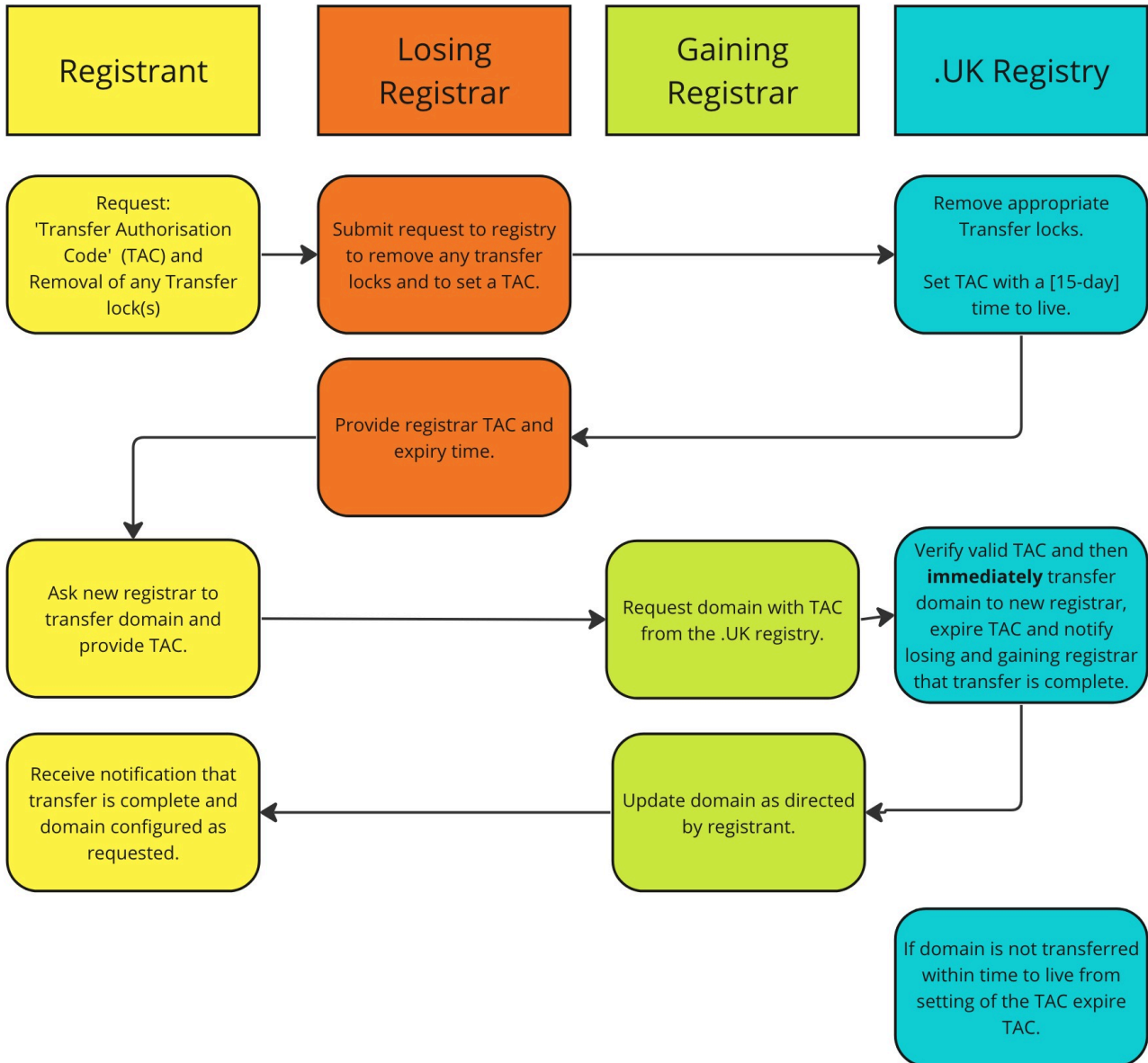
.UK Inter-registrar transfer policy

1. Policy version DRAFT-2024-016
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. **Consent may be provided within a registrar's terms and conditions, but any terms may not restrict the registrants right to removal of the lock in accordance with registry policy.**
 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 **transfer** dispute or audit **of compliance**, 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, **provided the gaining registrar supports incoming transfer 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. **For the avoidance of doubt registrars are free to charge for incoming transfers whether a renewal is requested or not.**
 - 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.

Inter-Registrar Transfer process.



.UK Registry-Registrar Lifecycle Policy

1. Policy version: DRAFT-2024-016
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. Transfer Lock on registration, transfer or change of registrant

- a. The registry will not apply a transfer lock on registration, transfer or change of registrant.
- b. Registrars may and are encouraged to utilise transfer locks as a matter of good security practice but where they do so must remove them at the Registrants request in accordance with the .UK Inter-Registrar Transfer Policy.

4. 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.

5. 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.

6. 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.

7. 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.
8. **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.

9. 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).
- d. Registrars must not restore domain to assume rights, use or sell the domain for themselves or a third-party that is not the Registrant.

10. **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.

.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.

Interim Data Quality Policy.

Policy version: DRAFT-2024-046

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 this Interim Data Quality policy~~ ~~with this interim policy~~ will come into effect at transition to the Nominet Registry Services Provider platform.

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.