

# Domain Name Renewals at Nominet

## Feedback on the White Paper for the PAB

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### **A. Introduction**

This document summarises feedback on version 2.00 of the White Paper produced in response to the Subcommittee of the PAB dealing with domain name renewals at Nominet.

This document only deals with summary sent to *pab-suggest@nominet.org.uk*, or to the author directly. These are the mechanisms for feedback detailed within the document. Specifically it does not attempt to summarise debate on *nom-steer*, which whilst providing a fair amount of discussion, was less structured, and difficult to summarise; further, it was unclear whether it was, or was not, intended as formal comment on the proposals.

Copies of all comments received are attached as Appendix I.

### **B. Executive Summary**

The respondents in general were in favour of positive renewals, with immediate suspension on expiry, and the 'winding back' option. These, together with other themes that emerged, are detailed below. It should be noted that the author does not claim that the respondents necessarily represent a statistically valid sample of members, tag-holders, or stakeholders.

#### *Support for positive renewals*

60% of those respondents (6 against 4) expressing a non-neutral opinion were in support of positive renewals.

#### *Support for immediate suspension upon expiry*

80% of those respondents (8 against 2) expressing a non-neutral opinion were in support of immediate suspension of non-renewed domain names on their expiry.

#### *Support for 'winding back'*

87.5% of those respondents (7 against 1) expressing a non-neutral opinion were in support of the 'winding back' proposals.

#### *Option for automatic renewal*

Several respondents suggest a mechanism of flagging domain names for 'automatic renewal' should be instituted. This was a common theme between those for, and against the proposals. Tellingly, several against the proposals suggested that this would sway their opinion. The author notes that tag-holders wishing to simulate negative renewal could register domains (by template) with this flag set, and unset it for those domains they do not wish to renew. No respondent argued against this.

#### *Support for retaining detag*

Several respondents stressed the importance of retaining a detag option for purposes other than indicating that tag-holders did not wish to renew a domain name. The author notes that it was not the subcommittee's intention to remove 'detag' which would be kept to indicate that the tag-holder had ceased contractual relationship with the registrant. No respondent argued against this

### *Fixed period*

Several respondents suggested a fixed period between suspension and return of a domain name to the pool. No respondent argued against this.

### *Certificates*

Several respondents detailed their lack of support for physical certification. Whilst this is outside the scope of this consultation, comment is made for the purpose of alerting the PAB to the prevalence of this opinion.

## **C. Methodology of Analysis of Comments**

Comments were received both on the initial white paper (version 1.0, prior to the PAB Subcommittee meeting, referred to as the 'First Draft'), and the white paper as currently published (version 2.0, subsequent to the Subcommittee meeting, referred to as 'Second Draft').

Feedback already present at the time of the first draft was noted at the Subcommittee, and the Subcommittee largely followed the opinions of those providing feedback. Where no further response was received from the respondent, the original response has been compared against the second draft proposal. Where a second response has been received, on any points on which the two responses differ, the second has taken priority. Where multiple items of correspondence were provided from a single individual on the same draft, the latter comment has been assumed to take precedence in the case of conflict.

No attempt was made to verify the connection of individual respondents with individual members of Nominet. No attempt was made to provide ranking of responses by number of domain names registered, or on the relevant tag.

The ordering of responses within this document is arbitrary.

Attitude to various questions were rated between 1 and 5 according to the table below.

1	Rejection
2	Conditional or limited rejection
3	Neutral
4	Conditional or limited support
5	Support

Where no comment on a specific issue was supplied, a neutral rating was in general applied. Notably, where respondents rejected the entire concept of positive renewals, and did not mention 'winding back' or 'immediate suspension upon expiry', the latter (which are only relevant in the context of positive renewals) were ranked as neutral. Where respondents did not mention 'winding back' or 'immediate suspension upon expiry' (proposals only within the second draft), then unless they were commenting on the second draft and expressed an explicit statement for support for that draft, which made these proposals (in which case they would be ranked as support), these were also ranked as neutral.

Results are as follows:

	<b>Respondent</b>	<b>Positive renewals</b>	<b>Immediate suspension on expiry</b>	<b>Winding back</b>
R1.	Terence Gethin – Easily	5	5	5
R2.	Sam Kington – UK2.Net	5	5	5
R3.	Alex Kells – Frontier	5	5	5
R4.	Heidi Coates - Newnet	3	3	3
R5.	Joe Telford – aes.co.uk	1	3	3
R6.	Sebastien Lahtinen – ncx.net.uk	5	5	5
R7.	Jason Clifford – ukpost.com	5	5	5
R8.	Bryon Dun – Namehog	3	3	3
R9.	Tim Chown – Web Centre UK	1	1	1
R10.	Paul Lomax - Fibranet	5	5	4
R11.	PD Miller - Caribdata	1	3	3
R12.	Brian Clifton – Omega Digital Media	3	3	3
R13.	Claire Civil - Holistech	3	1	3
R14.	Philip Wade – XKO Network Systems Ltd	2	3	3
R15.	Gay Aylett – Enterprise AB Ltd	3	5	3
R16.	Graham – Firevision	3	5	5
	<b>Average</b>	<b>3.3125</b>	<b>3.75</b>	<b>3.6875</b>
1	Rejection	3	2	1
2	Conditional or limited rejection	1	0	0
3	Neutral	6	6	8
4	Conditional or limited support	0	0	1
5	Support	6	8	6
	Against (rejection, categories 1 and 2)	4	2	1
	For (support, categories 4 and 5)	6	8	7
	<b>% of those expressing an opinion that are 'For'</b>	<b>60.00%</b>	<b>80.00%</b>	<b>87.50%</b>

**D. Analysis by Correspondent**

**R1. Terence Gethin – Easily**

Detailed comments on the first draft, a few lines on the second draft.

Strongly in favour of the proposal.

*I think it's excellent, and after a first reading I can't think of a single thing I would wish to see changed.*

The respondent almost invariably supported the points made by the subcommittee in its second draft. Other notable points made were as follows:

1. *Q C.I:* The respondent suggested the possibility of a mechanism for registrants to inform Nominet that a renewal was not required.

2. *Q F.1:* The respondent argued it that as those tag-holders processing high volumes dealt with the most registrants, it was especially important for the renewals process to be efficient for those tag-holders.
3. *Q F.16:* The respondent argued (commenting on the first draft, which documented the Forum Proposal under which a domain could be renewed at any time) that a renewal window of 2 months prior to the expiry date should be adopted. The subcommittee in effect adopted a six month renewal window, and the respondent made no criticism of this as an exception from his stated view above.
4. *Q F.18:* The correspondent argued that the positive impact on Nominet would be sufficient that load smoothing would no longer be required.
5. The correspondent argued that it was very important that the expiry date on whois was updated promptly following a renewal request. The correspondent sent a second email to underline this point.

R2. *Sam Kington – UK2.Net*

Detailed comments on both drafts.

The respondent was in general support of the proposal. Other notable points made were as follows.

1. *Q F.4:* the respondent supported the expiry date being in the whois, but argued:
 

*If the expiry date is in the whois, though, we need more billing information there. I would argue that recur-bill should be in there as well (so the registrant knows who will be asked to pay), and I'd also like to see some indication that the tagholder has agreed to pay for the renewal - we have clients paying up to 90 days in advance, and they're not happy at seeing the expiry date in our database not change, even though we tell them it's because Nominet haven't billed us for it*
2. *Q F.6:* the respondent argued that unrenewed domains should be suspended immediately upon expiry.
 

*We thoroughly approve of immediate suspension of domains, with the caveat that it must be easy to get a domain reactivated / retagged. Late renewals are the source of most of our time-consuming hassles with Nominet domains.*

*Many customers only realise their domain was up for renewal when the nameservers go, and their domain stops working - either because they didn't get the renewal email, or because they didn't read it properly, or whatever. That's why we should suspend the nameservers as soon as possible, and give a generous delay for the tag holder to renew the domain before Nominet gets involved.*
3. *Q F.6:* the respondent supports 'winding back'.
 

*We approve of winding back. It's rarely that we get domains transferred in from tag holders that could potentially go bust, and we can take that hit. More cautious members may decide to only accept domains that are marked as having been paid up, not just invoiced (assuming the whois makes that distinction, as I think it should).*
4. *Q F.6:* the respondent sees no need for Nominet to contact the registrant (in the case of a domain on a tag) prior to the domain's expiry.

5. *Q F.7:* the respondent stressed the importance of making renewal requests from Nominet encourage the registrant to use their existing, or another tagholder, thereby potentially automating another manual process.

*Nominet should invoice renewals at the standard 80 pound rate, and should stress the importance of either renewing with their existing tag holder or transferring to another tag holder. This, incidentally, would make it possible to automate the current system where people want to move detagged domains to us, as a tag holder. At the moment Nominet send us a manual email, which we also respond to manually, asking us to approve the transfer. The registrant also has to send in paperwork, and the whole thing can get horribly messy.*

6. *Q F.9:* the respondent felt it was impossible to give a useful answer with respect to data cleaning whilst the whois did not give sufficient information to ascertain the dirtiness or otherwise of existing data. The respondent stresses that data cleaning proposals should not cause renewal requests to fail through lack of cleaning. The respondent further commented:

*We let registrants update their Nominet contact details automatically. The problem is that they can't necessarily tell what information Nominet have already. By showing street address in the whois that will at least remind registrants that they haven't updated their details since they moved house, say, although that doesn't help for email.*

R3. *Alex Kells – Frontier*

Comments on both the first and second draft, both broadly supportive.

Comments on the first draft essentially stated that there were three (rather than two) alternative renewal mechanisms – differentiating between the ‘marked proforma’ for renewal, and the detagging (negative renewal) mechanism. However, the respondent preferred the positive renewal mechanism.

Other notable points:

1. *Q F.6:* The correspondent suggested in their comments on the first draft and second draft that unrenewed domains be suspended immediately upon expiry, but only the tag-holder be notified initially. After 28 days, the registrant would be notified, and be given a further 28 days prior to the return of the domain name to the pool.
2. The respondent stressed the importance of retaining the ‘detag’ function for other situations where the tagholder has terminated its contractual relationship with the registrant.

R4. *Heidi Coates - Newnet*

Comments on the first draft. Neutral in respect of proposals.

The respondent did not have any ‘real problems’ with the current system, but suggested a number of changes, including automatic mailing of the list of domain names coming up for renewal (as suggested by the proposal), sending pro-formas out instead of invoices to avoid credit notes, and facilitating retagging.

However, the respondent also suggested:

*For the domains to work like .com's when it comes to expiring as this would prompt the customer to contact us for renewal if their domain stopped working.*

The author takes this to be support for suspension on expiry, and for a positive renewals model. However, in light of the former comment about there being no problem with the current model, this response has been marked as neutral.

R5. *Joe Telford – aes.co.uk*

Comments were provided on the Second Draft. The respondent is in general against the move to positive renewals, though makes a number of detailed comments on the positive renewal system anyway.

Notable points:

1. The respondent argued that to some extent the proposals were made from the perspective of Nominet, and with the intent of dealing with miscreant tagholders. The respondent further argued that the current system worked well for other tagholders who behave professionally. The respondent believes the negative renewal system to be more efficient, and believes it should be retained or changed slightly, rather than replaced with a positive renewal system.
2. *Q F.3* The respondent expressed some concern about other agencies knowing when domains become due for renewal: *'because of the number of domain shoppers around. (though we appreciate the likely protection offered)'*
3. *Q F.4* The respondent expressed some concern that the payment status is shown, considering this to be a matter private to the tagholder.
4. *Q F.6* The respondent suggested that Nominet should not act on registrant requests (made directly to Nominet) when a registrant has refused to pay the current tagholder renewal costs.
5. *Q F.13* The respondent suggests moving the registration period to 3 years, but retaining the same charge as is currently made for a 2 year rate. The respondent considers many of his clients would accept a 10 year renewal period.
6. The respondent suggests that instead of the proposed renewal changes, renewals be made on a negative-renewal basis by proforma 30 days prior to the expiry date.
7. The respondent suggests that a 'professional standards body' be considered.

R6. *Sebastien Lahtinen – ncx.net.uk*

The respondent commented on the Second Draft, and was in principle supportive.

The respondent made the following notable points.

1. The respondent suggested that Nominet should make available an automatic renewal facility.

*Nominet should consider providing tagholders with an auto-renewal facility. This is particularly useful for those tagholders who only register domain names for themselves. Once a domain is auto-renewed, no credit notes should be issued.*

2. The respondent stressed the need to retain the 'detag' option.

R7. *Jason Clifford – ukpost.com*

The respondent commented on the Second Draft and was very supportive of its contents.

R8. Bryon Dun – Namehog

The respondent commented on the Second Draft.

The respondent made detailed suggestions as to how to implement ‘*Domain Renewals possible via an online ASP database - with user password protection.*’. This in essence describes a positive renewal system, albeit implemented differently from the one described in the White Paper.

The respondent passed no comment on the proposals within the second draft, and therefore this response has been ranked as neutral.

R9. Tim Chown – Web Centre UK

The respondent commented on the Second Draft, and appears not to be in favour of the proposed changes.

The respondent commented that the proposed changes:

*The proposed changes appear a recipe for accidents to happen. There either has to be a grace period for payment (our finance team can take up to 30 days to generate payment from date of receipt of the invoice), or the invoice should be sent out 60 days in advance. However, it seems we now have to actively renew all domains in advance, rather than the default to be for the domain to be renewed on the invoice - this will be a second avenue for mistakes to happen. We do not mind paying renewals in advance of payment from our clients; this is an acceptable risk. If the client does not pay, we will later detag the domain.*

This would appear to be a criticism in particular of the ‘winding back’ proposal, or a suggestion that winding back should not take place until 60 days after the invoice date. (For clarification, it was not the subcommittee’s intent that winding back should automatically take place exactly 30 days after invoice date, but rather if the credit control team determined an invoice was not likely to be paid). There is perhaps an implied criticism of the ‘immediate suspension upon expiry’ proposal too.

The respondent further commented:

*The changes seem geared to target the guilty, rather than make life for the innocent simple (and to avoid the innocent being suspended wrongly).*

R10. Paul Lomax - Fibranet

The respondent commented on the Second Draft. The respondent agreed with the analysis of the problem, particularly in respect of detagging, and was supportive of the proposal.

Notable points included:

1. *Q F.6* The respondent was in favour of immediate suspension on expiry.
2. The respondent particularly welcomed the ability of a registrant to change tags on or just after the renewal date even if they had not paid the renewal fee.

3. *Q F.6* The respondent made detailed comment on the ‘winding back’ proposal, detailed various problems, but appears to support it as a ‘least bad’ option.
4. The respondent suggests that one year renewals be available, but only should Nominet increase its ‘*ludicrously low*’ price.
5. The respondent suggests that there should be a fixed period between suspension of an expired name, and its return to the pool, and this should be approximately 30 days.
6. The respondent makes a number of negative comments about the current certification process. These, whilst valuable input, are outside the scope of this consultation.

*R11. PD Miller - Caribdata*

The respondent comment on the Second Draft, and objects strongly to the concept of Positive Renewal, on the grounds of increased administrative burden.

The respondent suggests this would be mitigated by a mechanism by which the tag-holder’s desire for automatic renewal of domain names could be indicated.

*R12. Brian Clifton – Omega Digital Media*

The respondent comments on the Second Draft.

The respondent makes the following notable points:

1. Detagging for the purpose of indicating an end to a contractual relationship should be distinguished from use of detag to indicate that the tag-holder does not wish to renew. The respondent suggests that detag be used for the latter purpose and a different tag be used for the former purpose – the author notes that the positive renewal mechanism achieves this distinction in another manner (i.e. by obviating the need for the second use).
2. The author suggests that the above tag-change mechanism, combined with other aspects of the proposal, be used to ‘*simplify the renewals process*’:
 

*For example, another tag e.g. DIRECT, could be used to signal that the registrant has not responded, or the relationship with the tag holder has ceased, or what ever. Nominet should then contact the registrant direct, as per Appendix I, part 8 but not contact the tag holder. If the domain remains with the tag holder after the expiry date, then proceed as per Appendix I, part 8 (also see my comment below on Appendix I, 4).*
3. The respondent suggests that the number of members be reduced by improving the standards that each tagholder must uphold.
4. The respondent suggests a move to annual renewals, but that the current charge be retained.
5. The respondent makes a number of negative comments about the current certification process. These, whilst valuable input, are outside the scope of this consultation.
6. The respondent suggests that direct debit be made available to tagholders.



7. The respondent suggests a fixed period of 30 days for detagged domains to be released.

In summary, the respondent was in favour of a number of items in the proposal, but considered that the 'front end' should be altered, crucially in terms of a negative action rather than a positive action. In view of this disparity, the response has been marked as neutral.

R13. *Claire Civil - Holistech*

The respondent commented on the Second Draft, and appears to be neutral towards the proposals.

The correspondent makes the following notable points:

1. *Q F.6* The respondent is against immediate suspension on expiry, stating:

*There is nothing to be gained for Nominet in suspending a domain on the renewal date if they have not contacted the registrant directly. This will simply give tag-holders a third party to blame as they try to extract renewals from customers, thus bringing Nominet into disrepute. Tag holders agree to take the credit risk, and are already capable of disabling a domain. Nominet should protect its reputation by delaying suspension of a domain for at least 1 month after its expiry, sending reminder e-mails once per week during this period.*

2. The respondent makes a cogent argument for an automatic renewals facility, in essence stating that the move to positive renewals requires that the tagholder take action, which may well entail additional effort – if this is to be automated, the option to do so via Nominet should be provided. The respondent implies that this issue is critical.

R14. *Philip Wade – XKO Network Systems Ltd*

The respondent commented on the Second Draft. The respondent is against the positive renewal system. However, the respondent indicates their opinion 'might be changed' if it were possible to email tag-holders when names became eligible for renewal. This is a little confusing, as under the response to Q F.3, the subcommittee recommends exactly this. The response has thus been marked as conditional rejection.

R15. *Gay Aylett – Enterprise AB Ltd*

The respondent commented on the Second Draft, and confined the response to *Q F.6*.

1. The respondent is in favour of immediate suspension on expiry, and indeed suggests moving the process 4 weeks earlier.
2. The respondent fears that the winding back proposal might cause 'a lot of trouble' mainly due to Nominet's previously 'laid back' attitude to credit control. However, the respondent goes on to state '*Assuming all Tag holders are able to keep to 30 day credit terms and as long as the current payment status is shown on the whois, there should be no problems with this proposal.*' The author has thus marked this as neutral toward the winding back proposal.

*R16. Graham – Firevision*

The respondent has commented on the Second Draft, and is in favour of the proposals.

The respondent is in favour of suspension immediately upon expiry.

The respondent is in favour of a fixed amount of time between suspension and return to the pool.

The respondent suggests that renewals should be cancelable prior to invoice.

## Appendix I - Responses

## R1. Terence Gethin – Easily

### *Comments on the first draft*

From: "Terence Gethin" <terence@easily.co.uk>  
To: "Alex Bligh" <alex@nominet.org.uk>  
Cc: "Peter Gradwell" <peter@gradwell.com>  
Subject: Re: [nom-steer] Renewals subcommittee of the PAB - White Paper  
Date: Thu, 1 Aug 2002 15:54:04 +0100

Alex,

I'm sure it will come as no surprise to you that I would like to comment on your white paper regarding renewals.

First of all, I'd like to say that I think it's an excellent document, very thorough and clearly presented. I think you know my views already, so I'm not going to repeat them ad nauseam, I'll confine myself to responding to the points in the paper, including the questions to be posed to the PAB.

Section C, relating to change of T&Cs. I agree, the registrants' rights do not need to be changed, so I see no need for any alteration.

Q C.1 We support the principle that Nominet should continue to make at least one attempt to contact the registrant. A mechanism to allow the registrant to inform Nominet explicitly that renewal is not required could be a good idea, but would have to be thought through very carefully.

Section D, relating to informing tag-holders of domains to be renewed. Like many tag-holders, we apply the technique of converting registration dates into renewal dates, but it's not 100% effective. Our experience is that we cannot rely on Nominet to inform us about outstanding renewal fees for domains that are transferred after their expiry date, and hence we have domains on our tag with expiry dates in the past rather than the future. The facility for advance notice of renewals is extremely useful, but of course it does not deal with domains which are transferred between the date of advance notice and the date of renewal. It may be only a very small percentage of domains for which these problems occur, but unfortunately it's precisely these exceptions that take up time.

Section D, relating to changes of tag-holder between renewal date and invoice date. I think this is a very good example of the underlying flaws in the current process. We often end up with domains that have been transferred to our tag AFTER the registrant has paid the previous tag-holder for renewal, but BEFORE Nominet generate the renewal invoice. The registrant will insist that renewal has been paid for, but we can't renew the domain until the registrant undertakes to pay us. And of course the same thing happens in reverse. We send our first renewal notice two months before expiry, so potentially a customer might pay us as much as 3 months before Nominet's invoice is generated. What are we to do? We don't want to block outgoing tag transfers for 3 months, but we also don't want to deal with the confusion that arises if we allow the transfer to go through.

Q E.1 We support the principles.

Q E.2 (marked E.1) We do not see any incompatibility.

Q F.1 It's difficult to know if the participants were a representative model. But I would suggest that most high-volume tag-holders probably use something like the method described. I'm not suggesting that everything should be organised to suit the high-volume businesses, but I would point out that by definition these businesses do serve the largest proportion of registrants, so it's important for us to be able to work efficiently.

Q F.2 I'm inclined to take the view that a contractual obligation is not necessary, because of Nominet's own commitment to attempt to contact the registrant. Having said that, I have no fundamental objection to having such a commitment written into the tag-holder agreement provided (a) that it is only applied to domains that are registered or renewed after the change (i.e. the commitment is not applied retrospectively to existing registrations) and (b) the commitment is not too onerous - I would regard attempting to contact the registrant by email as reasonable, but probably no more than that.

Q F.5 YES !!!

Q F.9 We agree that renewal is a good opportunity for data cleaning.

Q F.10 I can see very little distinction. I think this is a good example of how the whole process is simplified under the 'Forum' proposal, a lot of existing complications become unnecessary.

Q F.11 Yes.

Q F.13 No.

Q F.14 No.

Q F.16 You may remember that in my original proposal, I suggested a 'renewal window' that would start 2 months (say) before the expiry date. This would limit the maximum outstanding registration period to 2 years + 2 months. Otherwise we have the rather odd situation where a registrant is prohibited from registering a domain for 4 years, but can register for 2 years and then immediately extend for a further 2 years.

Q F.18 I think the reduction in Nominet's workload, if the 'Forum' proposal is adopted, will be SO HUGE that load-smoothing will no longer be an issue.

...

I think the most important part of my proposal was to replace the current system of invoicing for all expiring domains on a tag with a system of 'positive renewal' requests, submitted by an instruction to the automaton resulting in the renewal being invoiced on the next invoice run. As I understand it, this is also the core of the 'Forum proposal', so it addresses my main concerns.

I think I still prefer the concept of a 'renewal window', rather than being allowed to renew at any time, but I covered that in my previous email and I'm certainly not interested in dying in a ditch over it. Early renewal will improve our cashflow, so I won't be complaining!

The only other key point that occurs to me is the question of what actually happens when a renewal request is made. It's not explicitly stated in the white paper, but my assumption is that when a renewal request is sent to the automaton, a confirmation email would be sent back to the tag-holder, just as it is now for new registrations. And since the whois system is going to be displaying expiry dates at some point in the future, I have also assumed that under the Forum proposal the expiry date shown on the whois system will be updated promptly to show the new expiry date. On this point I might consider the martyrdom option, because I think it's very important.

The only other thing I omitted to say before was that I think it would be extremely useful for tag-holders to be able to query the automaton for lists of domains on their tag based on expiry date, in addition to the existing registration date query.

...

I would say it's absolutely vital for the whois to update immediately after a renewal request. I wouldn't like to contemplate the flood of queries from confused and unhappy registrants that we'll get if the whois displays the expiry date but is not updated until Nominet is actually paid, which could potentially be nearly 2 months later (e.g. renewal requested August 1st, invoice generated September 1st, invoice paid 30 days later).

If the whois is not updated promptly, we would waste one of the more important benefits of the proposal, and it would actually increase registrant confusion over whether a domain had been renewed or not. I understand the concern about defaulting tag-holders, but I'm not sure I see why it's any different to the existing situation with new registrations. One of the strengths of the proposal is that it makes the renewal process consistent with the registration process - let's not lose that advantage.

Terence

***Comments on the Second Draft***

From: "Terence Gethin" <terence@easily.co.uk>  
To: "Alex Bligh" <alex@nominet.org.uk>  
Cc: "Lesley Cowley" <lesley@nominet.org.uk>  
Subject: Re: [nom-steer] Renewals Subcommittee - Conclusions, and Updated White Paper  
Date: Fri, 13 Sep 2002

Alex,

I haven't read the whole document, since I feel I'm reasonably familiar with the issues, but I have read the proposal.

I think it's excellent, and after a first reading I can't think of a single thing I would wish to see changed.

Regards,

Terence Gethin

## R2. Sam Kington – UK2.Net

### *Comments on the First Draft*

Date: Thu, 01 Aug 2002 16:05:32 +0100  
Subject: RENEWALS SUBCOMMITTEE  
From: Sam Kington <skington@uk2.net>  
To: <pab-suggest@nominet.org.uk>

Hi,

A few comments on Alex's PDF.

Q F.4, on extra whois details:

It's arguable that the expiry date should be in the whois, as we want people checking the whois records of their domain to realise that it's about to expire. Not many people do that, but every little helps. Of course, you then have the problem that people can then work out which domains are due to expire and attempt to grab them as soon as they're released, but a) Nominet releases domains randomly to avoid that sort of thing happening, and b) you can work out the expiry date from the registration date *\*anyway\**.

This will also help tagholders work out which domains need to be renewed. Yes, the automaton can tell you a whole month's worth, but that's a) unsubtle, and b) doesn't work for large tag holders, as the automaton blows up after a certain point.

If the expiry date is in the whois, though, we need more billing information there. I would argue that recur-bill should be in there as well (so the registrant knows who will be asked to pay), and I'd also like to see some indication that the tagholder has agreed to pay for the renewal - we have clients paying up to 90 days in advance, and they're not happy at seeing the expiry date in our database not change, even though we tell them it's because Nominet haven't billed us for it

(<http://help.uk2.net/faq/renewals/irenewedmy.ukdomainbuttheexpirydatehasntchanged.html>).

Possibly some sort of "billing status" field would be of use - similar to the status field you get in cno / .biz / .info whois.

For that to work, though, we'd need an automaton query where a tagholder could explicitly say that he intended to renew a domain (the Forum Proposal). This would be the logically opposite of a detag, which is the tagholder explicitly saying that he does *\*not\** intend to renew a domain.

Note that I think that positive renewals are *\*required\** if we're going to have the expiry date in the whois.

Q F.5: Do we support a positive renewals model

Yes. It would also have the advantage of bringing Nominet into line with the rest of the world (not always a good thing, but in this case I think it is).

Q F.6: Do we support / want to modify the Forum Proposal?

Yes, although I'd make suspension of services (nameserver changes) immediate, and give registrants a month to renew.

Q F.7: Should we support a last-chance renewal?

Many customers only realise their domain was up for renewal when the nameservers go, and their domain stops working - either because they didn't get the renewal email, or because they didn't read it properly, or whatever. That's why we should suspend the nameservers as soon as possible, and give a generous delay for the tag holder to renew the domain before Nominet gets involved.

Nominet should invoice renewals at the standard 80 pound rate, and should stress the importance of either renewing with their existing tag holder or transferring to another tag holder.

This, incidentally, would make it possible to automate the current system where people want to move detagged domains to us, as a tag holder. At the moment Nominet send us a manual email, which we also respond to manually, asking us to approve the transfer. The registrant also has to send in paperwork, and the whole thing can get horribly messy.

It would be far better for the client to be able to contact Nominet and ask them to move the domain to another tag, at which point the domain would be transferred to the new tag, but in a status of "renewal pending" - and the nameservers would remain blank until the new tag holder sent in an automaton request to renew the domain. That way, the only manual intervention needed is between the registrant and Nominet.

Q F.8: Nominet's attempts to correct their database

I don't think we can answer that question yet, as the whois does not currently display the contents of Nominet's contact database. As such, tag holders do not know whether Nominet has accurate information or not.

Q F.9: Data cleaning during renewals

Again, we don't have a way of telling whether Nominet's data is correct or not.

Also, data cleaning shouldn't hold up a renewal in such a way as the registrant's domain stops working. If the registrant has informed the tag holder that they want to renew, and the tag holder has sent the renew request, Nominet should not suspend the domain because their database is not to their liking. Customers will \*not\* understand that.

Q F.10: Distinction between th and bc?

We never use the recur-bill field.

Q F.12: Alternative methods of data-cleaning

If we're only concerned about the data that's publicly available, tag holders can crawl the whois and clean up the records at their own pace. Alternatively, Nominet can contact tag holders with a list of domains that they would like to see rectified. How practical that is depends on the number of domains and the format of the email.

Sam  
UK2.Net Senior Developer

***Comments on the Second Draft***

Date: Mon, 23 Sep 2002 16:33:40 +0100  
Subject: Comments on the renewal subcommittee's report  
From: Sam Kington <skington@uk2.net>  
To: <pab-suggest@nominet.org.uk>

WRT <http://www.alex.org.uk/nominet/renewals2.pdf>:

A F.6 a:

We thoroughly approve of immediate suspension of domains, with the caveat that it must be easy to get a domain reactivated / retagged. Late renewals are the source of most of our time-consuming hassles with Nominet domains.

Similarly, we do not see the need for Nominet to contact the registrant prior to the expiry date of the domain.

A F.6 b:

We approve of winding back. It's rarely that we get domains transferred in from tag holders that could potentially go bust, and we can take that hit.



More cautious members may decide to only accept domains that are marked as having been paid up, not just invoiced (assuming the whois makes that distinction, as I think it should).

A F.7:

Is Nominet going to contact the registrant by email or snail mail? There's a fair chance that emails may be wrongly binned as spam, because the registrant has no prior overt relationship with Nominet.

The renewal warning should mention that the registrant can either renew with Nominet (easy but £80) or another tag holder (cheaper but more hoops to jump through).

A F.8:

The email could easily be sent to postmaster@domain.co.uk or sales@domain.co.uk (the latter doesn't scale well to org.uk - maybe info instead - but is most likely to work). The problem is timing this with the suspension of the domain name, as suspension presumably means DNS stops working.

A F.9:

No other ccTLD or gTLD systems currently have a requirement to clean up the whois database as part of renewal, so adding this requirement would further differentiate Nominet (needlessly, I would say) from other registrars. If Nominet chooses to regularly deliver reports on which domains have incomplete data, and to time that with the renewal process (ideally 3 months before a domain expires, to give people time to respond when you take into account holidays, illness etc.), that would be better than a compulsory additional mechanism.

After all, if someone chooses to renew 10 domains and all but one have accurate information, it's going to be difficult to explain why one of them didn't go through, especially as an asynchronous email-based system does *\*not\** lend itself to easy analysis of failures. At UK2 we assume that an email request to the automaton is going to succeed, and have regular daily checks to make sure registrations etc. went through, but it's non-trivial to be able to tie individual requests to email responses.

More importantly: renewal requests shouldn't fail; they're too important for that. This is someone's business in jeopardy because they're misspelled their postcode (say), which I think is taking data cleaning too far.

A F.10:

The recur-bill field causes us nothing but hassle, and we don't see a need for it.

A F.11:

Agree, but a ten-year renewal might offer a short-term cash boost for Nominet. If Nominet wants to make sure the information in their database is accurate, would it be worthwhile sending out email reminders every so often (every year, say)?

A F.12:

We let registrants update their Nominet contact details automatically. The problem is that they can't necessarily tell what information Nominet have already. By showing street address in the whois that will at least remind registrants that they haven't updated their details since they moved house, say, although that doesn't help for email. An easy way of telling what information Nominet have on file might be useful - emailing details to hostmaster@domain.co.uk, although that email could be hijacked.

A F.13:

Agreed. One-year renewals are a pain.

A F.14:

This is orthogonal to the question of renewals.

A F.17:

The current long delay between ordering a domain and getting the physical certificate isn't helping matters - by the time you receive the certificate, you may have forgotten about the domain, or not even be at the same physical address any more.

A F.18:

The pattern of renewals can be extrapolated from the pattern of registration; that gives Nominet staff plenty of opportunity to deal with changing loads.

Sam

--

UK2.Net Senior Developer

## R3 Alex Kells – Frontier

### *Comments on the First Draft*

Subject: RENEWALS SUBCOMMITTEE  
Date: Mon, 5 Aug 2002 12:06:02 +0100  
From: "+ Hostmaster Team" <naming@directors.ftech.net>  
To: <pab-suggest@nominet.org.uk>  
Cc: "+ Hostmaster Team" <naming@directors.ftech.net>

There seem to be 3 main suggestions for a new renewal procedure:

1. Nominet issue a proforma, and the ISP marks off which domains they wish to renew, Nominet then issue an invoice based on response to the proforma. This is similar to how CentralNic operate, and would be best implemented alongside an "online control panel" to allow everything to be done electronically (as per CentralNic). Presumably the domains that are not marked for renewal would be suspended by Nominet?
2. Nominet bill for domains on the 14th of the month following registrations. Any unwanted renewals would need to be detagged before this date as anything that appears on the invoice would be payable. This seems a reasonable suggestion, but I would prefer that the invoice be raised on the 28th day of the following month, giving plenty of time for the domain to be put on hold in the meantime (by removing the zone file).
3. Positive Renewal ie the tag holder can send a message to the automaton to renew the domain. An invoice would then be generated only showing the domains that are specifically requested. This is the option preferred by Frontier Internet. However, I would suggest that Nominet only send an invoice directly to the Registrant after a period of suspension (during which the tag holder can renew and reactivate the domain). Once Nominet send an invoice to the customer it should be taken out of the tag holder's control and be moved to the Nominet tag ie completely disassociated with the ISP. Otherwise a situation could occur where the Registrant renews directly with Nominet, but the ISP is still providing service (without having received payment).

--

Alex Kells - Senior Hostmaster - Frontier Internet Services Ltd

### *Comments on the Second Draft*

Subject: RENEWALS SUBCOMMITTEE  
Date: Mon, 23 Sep 2002 17:39:45 +0100  
From: "+ Hostmaster Team" <naming@ftech.net>  
Sender: "Alex Kells" <Alex.Kells@ftech.net>  
To: <pab-suggest@nominet.org.uk>  
Cc: "+ Hostmaster Team" <naming@ftech.net>,  
"Nick Gordon" <Nick.Gordon@ftech.net>

With regard to positive renewals, overall Frontier Internet (FTECH) is in agreement with the Forum Proposal. However, there are a few points that I would like to raise:

We would prefer that the domain be put on hold (as per the proposal) if no renewal command is received from the tag holder by the time the renewal is due. However, at that point Nominet sends a reminder notice (by email) to the tag holder only. There would then be a grace period of possibly 14-28 days in which the tag holder can renew the domain by sending a renewal command to the automaton. Once this point has passed, if no renewal command has been made, the domain is removed from the tagholders tag, and Nominet only then contacts the Registrant to offer a direct renewal. If the Registrant declines to renew the domain directly with Nominet, then after a certain period (possibly 28 days) the domain would be returned to the pool for re-registration. It would need to be explained to the Registrant that the direct renewal would be for renewal of the domain only, not for any hosting services that they may have had with the previous tag holder.

This would avoid the problem of the Registrant paying a renewal directly to Nominet but expecting the tag holder to continue providing service on the domain for free. Many ISPs bundle domain registration/renewal costs with other services.

I assume that the "detag" function would remain in use for those situations where the tag holder wishes to terminate the agent relationship between themselves and the Registrant, and also for where the Registrant wishes to proactively cancel a domain, rather than allowing it to expire naturally.

--  
Alex Kells - Senior Hostmaster - Frontier Internet Services Ltd

## R4. Heidi Coates - NewNet

### *Comments on the First Draft*

Date: Tue, 06 Aug 2002 09:27:08 +0100  
From: Heidi Coates <heidi@newnet.co.uk>  
To: peter@gradwell.com  
CC: pab-feedback@nominet.org.uk  
Subject: Re: Nominet Renewals

Hi,

Just managed to read your Nominet white paper concerning a change in your renewal procedure.

As a company we don't have any real problems when it comes to nominet renewals. However we do request an advanced renewal list which it would be more useful if nominet always sent us, for example the October list around the end of August. As we like to invoice our customers at least a month in advance as it seems to take most of them at least this long to make payment. For October renewals, around December we would attempt to contact all customers who had not either paid their renewal or informed us that they won't be renewing. Obviously a lot of telephone numbers are no longer valid or the domain owners no longer lives there so we detag these domains. We leave messaged for many customers giving them a certain time span to get back to us with payment and detag the ones we don't hear from. This causes many problems and we have recently been asked to retag domains to us which we have detagged due to non payment, this is always a lot of hassle and try to avoid doing this.

We now put the following line along the bottom on each renewal notice in hope to prompt the customer to pay on time:

Payment received after this date may result in a suspension of service and the removal of the domain name by the TLD registrar. Late renewals are subject to an additional 20.00 +VAT renewal fee.

We only actually charge the =20 admin fee if the domain has been detagged and needs retagging.

In comparison to Nominet renewals I find .com renewals generally easier this is mainly because:

1. There are a lot less of them
2. The registrant company sends us 2 reminders by e-mail, one 60 days before the domain is due to expire and a second reminder 30 days before the domain is due to expire
3. They then send us a 5 day deactivation notice 5 days before the domain is due to expire
4. They also send the deactivation notice to the customer direct, informing them to contact their ISP
5. Once they expire the registrant company (Tucows) immediately places them on hold
6. 40 days after their expiry they are put back up on the market

This means if the domain is in use then the customer will notice straight away that their domain has expired as their website will not work at all. Also if the customer makes a late payment we either pay Tucows late and their site is taken off hold within 48 hours or we register the domain from new if it hasn't already been purchased by someone else.

Suggested renewal changes:

1. Automatically send the customer renewal lists around 1 month in advance without the customer having to prompt Nominet

2. Send renewals out instead of invoices as this will avoid credit notes being issued constantly.

3. For the domains to work like .com's when it comes to expiring as this would prompt the customer to contact us for renewal if their domain stopped working.

4. If retagging could be easier somehow this would save us a lot of time and energy

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Many thanks  
Heidi

## R5. Joe Telford – aes.co.uk

### *Comments on the Second Draft*

Date: Fri, 20 Sep 2002 00:53:10 +0100  
From: Joe Telford <jht@aes.co.uk>  
To: alex@nominet.org.uk  
Subject: Renewals at Nominet White paper Comments

Dear Alex

Thank you for your recent white paper and for the opportunity to comment on the proposals.

I found the points raised very well presented and the conclusions presented as proposals quite logical, albeit from the perspective of Nominet. I would like to raise some issues which relate to the viewpoint of stakeholders, particularly Nominet members who are Tag Holders, and domain registrants themselves.

#### General issues -----

The impression which the document gives is the the changes to the renewal system is to so that the domain registrant is protected so that they can be aware of the need for a domain renewal. Much discussion is made in the document of unscrupulous Tag Holders/Members and their ways of withholding payments. The document points out that the average life-span of a business registering a Nominet domain is three years. If Tag holders have the same life expectancy, then a significant number of end users may need domain renewal information.

The current system would appear to work well for Tag holders who behave professionally and there is a school of thought which says that either the proposed changes these tag holders or that there is an abnormally high number of Tag holders who behave unprofessionally or who close down without any information being passed to clients.

#### Body Text of the document -----

P6. AF2: Adding more work to the Tag Holder is recognised as not preferrable. We agree with this.

P7. AF3.a. Approve the idea of default email re renewals.

P7. AF3.b.c. Some concerns about other agencies knowing when domains become due for registration because of the number of domain shoppers around. (though we appreciate the likely protection offered)

P8 AF4b. Some concern that the payment status is shown - this is private to the Tag holder/client and would be covered if the renewal got to the stage where a notice was sent out to the end user.

P10 AF6.a The relationship between tag holders and their clients is crucial to the industry.

P11 AF6.b Where a registrant refuses to pay the Tag Holder domain costs (and possibly for other services) Nominet should a) expect the Tag holder to pay for the domain registration. and b) either not interfere with the domain until the registant has paid outstanding bills, or positively support the tag holder by refering all registrant requests to the tag holder. Otherwise you place the Tag holder in the same position that nominet is trying to avoid being in.

P11 AF7. The th/bc field indicates to whom this should be sent - As a Tag Holder our business automatically responds to an invoice with payment - in order to reduce work linking payment to renewal makes a good deal of sense. Billing a tag holder's client at a tag holders/membership discount rate should not happen. Client billing if done should be at the standard rate - though some clients would see that as a low cost solution if they were intent on avoiding other

outstanding bills from the tag holder, and possibly being able to manage their domain outside that relationship.

P13 AF10. Is re contracting something which needs to be considered by all stakeholders - I wonder how a domain registrant feels about the Ts&Cs possibly changing every two years without discussion?

P13 AF13 Why not move the registration period to 3 years and if the Tag holders work load is to increase, provide this at the 2 year rate? This gives a much clearer window for the use of a domain (from the average life span info) Many of our clients would go for a 10 year registration period.

P14 AF17 Renewal with pre payment might simply generate an email confirming renewal, an update to the whois and a certificate sent out automatically at the end of the registration period for the renewal period.

#### Appendix 1

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1. The Negative action process is more cost effective, and time saving on tag holders who behave professionally. Is it fair to discriminate against these because of a few unscrupulous tag holders, who should perhaps be expelled.
- 2,3,4. This puts extra work on Tag holders.
5. Concern over the Tag Holder - Client relationship.
7. Implications for the client to avoid Tag holder Bills?
15. Privacy of information suggests that this not be visible on the whois.
19. We must have missed this - not sure why the field becomes redundant as there is still a need to know who should pay - Is there a possibility that both the TH and registrant would move to pay as a knee jerk reaction unless the Tag holder has the opportunity to pay first.

#### Other points

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What would be the effect of moving the current invoicing to 30 days before the end of the registration period - would this remove the need for proforma invoices? A payment within 30 days would obviate the need for renewal requests via ppp or the issuing of renewal requests.

Some Tag holder colleagues make a point that their business is commercial and that survival depends on client satisfaction, efficiency, and competitive pricing. The more work which nominet puts on Tag holders the lower their margins. Nominet on the other hand appears to be highly successful in developing income and appears to be automating its services and requiring more effort of its Tag holders.

The current model would run fine it would appear if some tag holders were more professional in their behaviour (particularly with respect to paying bills. Is there any merit in having a professional body which would enforce standards within the membership. We'd certainly approve of this and assist if necessary.

Sorry if this serves to demonstrate our lack of understanding, but best wishes anyway.

Joe



## R6. Sebastien Lahtinen – ncx.net.uk

### *Comments on the Second Draft*

Date: Wed, 11 Sep 2002 13:58:34 +0100 (BST)  
From: Sebastien Lahtinen <seb-nominet@ncx.net.uk>  
To: pab-suggest@nominet.org.uk  
Subject: RENEWALS SUBCOMMITTEE

In principle, I support the proposals made in the document available at (<http://www.alex.org.uk/nominet/renewals2.pdf> at 13:54 11/09/2002) but I have two concerns:

1. Nominet should consider providing tagholders with an auto-renewal facility. This is particularly useful for those tagholders who only register domain names for themselves. Once a domain is auto-renewed, no credit notes should be issued.
2. The proposal does not confirm whether a domain can still be DETAGGED. This option should always be available to tagholders where the client has request them to stop acting as their agent. As currently, nameservers should be removed so this is not an inexpensive alternative to the NOMINET tag. It will not be in the tagholders' interest to use this for those who simply do not wish to renew their domain names so the number of domains that are DETAGGED would be small.

Regards,

Sebastien.

(Additional note: I have only had time to quickly read through the proposal and as such there may be issues I have overlooked.)

## **R7. Jason Clifford – ukpost.com**

### *Comments on the Second Draft*

Date: Thu, 12 Sep 2002 17:55:34 +0100 (BST)  
From: Jason Clifford <jason@ukpost.com>  
To: pab-suggest@nominet.org.uk  
Subject: RENEWALS SUBCOMMITTEE - Feedback to "Domain Names Renewal at Nominet"

I'd like to voice my support for the proposals put forward in the White Paper.

They certainly meet all of the hopes I had from the PAB Forum after the AGM.

Jason Clifford

## R8. Bryon Dun – Namehog

### *Comments on the Second Draft*

Reply-To: "NameHog Ltd." <info@namehog.net>  
From: "NameHog Ltd." <info@namehog.net>  
To: <pab-suggest@nominet.org.uk>  
Subject: RENEWALS SUBCOMMITTEE  
Date: Thu, 19 Sep 2002 12:43:12 +0100

With regards to the renewal mechanism - has the group considered the possibility of making Domain Renewals possible via an online ASP database - with user password protection.

In this way Renewals as they become due (or 1 month previous) can be added to the data stack for a TAG holder, with a tick box - or submit flag for those domains that are to be renewed.

On submitting a "submit for renewal" flag to the system - the TAG holder indicates that they are prepared to pay for the Domain name.

The system would need only to show three months of domains - these being

First Block	-	Domains due last month
Second Block	-	Domains due this month
Third Block	-	Domains due next month

On the last day of the current month any domains not renewed and remaining showing on the system list for renewal during the previous month and not renewed online would automatically move to detagged or deleted and a list sent from the system to the TAG holder via email, and be removed from the data list.

On the last day of the current month - any domains due last month and renewed online would be added to a list sent from the system to the TAG holder via email, for payment within 28 days, this could be followed by a paper invoice summarising the renewals for that month, and be effectively counted as a "goods sold" invoice, with no cancellations allowed.

Any transfers in to a TAG holder could be shown as a separate data set - with the due renewal date. (immediate or deferred date)

Any domains renewed during the current month or due month would be added to the online invoice for the appropriate month.

It should be possible this way to provide a link from the data entry to retrieve owner details from the WHOIS within a pop-up window

I hope that this may be of some use to your thoughts - with a TAG holders perspective on renewals

Regards,

Bryon Dun  
Technical Director  
NameHog Ltd

## **R9. Tim Chown – Web Centre UK**

### *Comments on the Second Draft*

Date: Thu, 19 Sep 2002 13:23:56 +0100  
From: Tim Chown <tim@webc.coc.uk>  
To: pab-suggest@nominet.org.uk  
Cc: hostmaster@webc.co.uk  
Subject: RENEWALS SUBCOMMITTEE

Hi,

It would have been helpful to present the changes as summaries of impacts from the registrant and tag-holder perspectives.

The proposed changes appear a recipe for accidents to happen. There either has to be a grace period for payment (our finance team can take up to 30 days to generate payment from date of receipt of the invoice), or the invoice should be sent out 60 days in advance. However, it seems we now have to actively renew all domains in advance, rather than the default to be for the domain to be renewed on the invoice - this will be a second avenue for mistakes to happen.

We do not mind paying renewals in advance of payment from our clients; this is an acceptable risk. If the client does not pay, we will later detag the domain. That said, we only have of the order of 75-100 domains with you; we in turn generally use TotalRegistrations.com for new registrations because their online system is much more useful to us for checking domain status, information, etc (this may be something to for you to investigate in itself). We feel our Nominet membership is still very usefl however :)

The changes seem geared to target the guilty, rather than make life for the innocent simple (and to avoid the innocent being suspended wrongly).

Please bear this thought in mind in your subcommittee process.

Thanks,

Tim Chown  
WEB Centre UK

## R10. Paul Lomax - Fibranet

### *Comments on the Second Draft*

From: plomax@fibranet-services.co.uk  
To: pab-suggest@nominet.org.uk  
Subject: RENEWALS SUBCOMMITTEE  
Date: Thu, 19 Sep 2002 14:29:23 +0100

Dear Subcommittee Members,

Tag Holder: FIBRANET

We agree that the system of issuing credit notes (and our staff having to manually check thousands of domain names each month) is extremely costly for both of us, and quite frankly antiquated.

We agree that the system of Detagging and possible subsequent Retagging is unsatisfactory, as you have pointed out, it is currently the only way we have of not having to pay for many thousands of domain names each month for which we will receive no renewal fee from the customer. We ourselves have created an automated system to Detag any of our Nominet domains not renewed by our customer on the day after the renewal date.

We agree with and are very pleased to see a proposal to move to a Positive Renewal system... (just like the rest of the world!) ;-)

We agree that the name should be suspended immediately after the expiry of the registration period (if unpaid). We further agree that Nominet should contact the registrant of the domain name only once, at the point of suspension.

We very much like the ability of a registrant to move a domain to another tag holder on or just after the renewal date even if they have not paid the renewal fee, and that the new tag holder can then renew the domain and be invoiced by Nominet in the usual way. This scenario has caused a lot of grief in the past, and seems to be quite common as renewal dates appear to motivate a registrant to look for a new host if they are unhappy with their current service.

On the point of winding-back, we have discussed this point at length since receiving your white paper. The conclusion we have come to is that there will be instances where an end-user has paid his "old" host for the renewal, moved to a "new" host and because the "old" host has not paid Nominet the name will be suspended. Having said that, we feel that the regularity will be minimal (unless one of the big hosts goes belly-up!). It does cause grief for the new host - we know, it happens already with other names! - but this can probably only be resolved is for the end-user to pay the new host "again" for the renewal and to seek recompense from the "old" host... after all the contract that has been broken is that between the end-user and the "old" host.

The proposal to include payment (or non-payment) information via the WHOIS will go some way to "proving" to the end-user that the fault lies with their "old" host, and should go a long way to preventing a breakdown of the relationship between the end-user and the "new" host.

We have also discussed the option of preventing the movement of a domain in the period immediately prior to renewal, and more relevantly, until the renewal invoice is paid by the tag-holder but this would be quite frankly nightmarish!

On the subject of renewal periods, we would like to see an option for a one year renewal, as this can be wrapped within a package price to the end-user, although we fully understand that with Nominet's current ludicrously low price of £2.50 p.a. there is little point in doubling the costs associated from Nominet's point of view. Perhaps once a sensible price is charged by Nominet there will be scope for an annual renewal.

We would welcome a fixed time period between the suspension of the name and the returning of the name to the pool, as you know this is the grayest of gray areas at the moment, furthermore we can see no reason why this period should be more than 30 days after the suspension (expiry) date. 30 days is ample time for:

- a) someone to return from holiday
- b) the next pay cheque to arrive

etc... in other words there's no excuse for not being able to pay for a renewal within 30 days after the name is suspended. We see that the tighter the deadlines are made, the more motivated end-users will be to ensure they renew domains on time. Frankly until we started detagging names immediate after the renewal date, the system was so "wishy-washy" that customers felt they could ride the renewal out for months without any adverse consequences.

Mention is made in the white paper of the domain name certificate. Could someone explain to us:

- a) Why someone needs a physical paper certificate for a domain name.
- b) If they are so important, then how does nominet pay for these and postage thereof within a price of £5?

In closing may we thank you for your sterling efforts on behalf of us all.

Cheers

Paul Lomax  
CTO Fibranet Services Limited

## R11. PD Miller - Caribdata

### *Comments on the Second Draft*

Date: Thu, 19 Sep 2002 14:31:30 +0100  
To: pab-suggest@nominet.org.uk  
From: PD Miller <millerp@caribdata.co.uk>  
Subject: RENEWALS SUBCOMMITTEE

First, what is the point of distributing PDF files protected against copying? It is annoying, makes quoting from the document needlessly difficult, and serves no purpose whatsoever.

I wish to register our objection to the concept of 'Positive Renewal'. To have to undertake to track the renewal times of each domain name and renew accordingly would be an additional administrative burden to us compared to the current system.

Whilst I agree that there needs to be a mechanism in the automaton to mark a domain as 'not to be renewed', making every domain expire by default will lead to more cases of domains falling into the hands of domain pirates through minor administrative mistakes on the part of the TAG holder. This will expose us to legal action from our registrants for nonfeasance each time that a domain is missed in error.

If the committee insists on implementing a system like this, there should at least be a mechanism by which we can indicate that every domain is to be renewed unless explicitly terminated.

## R12. Brian Clifton – Omega Digital Media

### *Comments on the Second Draft*

From: "Brian Clifton" <brian@omegadm.co.uk>  
To: pab-suggest@nominet.org.uk  
Date: Thu, 19 Sep 2002 15:10:22 +0100  
Subject: RENEWALS SUBCOMMITTEE

Dear Alex et al

Just read your white paper on Domain Renewals at nominet - interesting reading! I have tried to make the following comments as succinct as possible and look forward to any replies:

#### GENERAL

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1] I think there should be another option for tag holders apart from just DETAGGED. Detagged should solely be to confirm to Nominet that the registrant does NOT wish to renew the domain and therefore there is no need for Nominet to further contact them. The detagged status should ONLY take effect on the expiry date, though it can be set at any time in advance of expiry by the tag holder.

For example, another tag e.g. DIRECT, could be used to signal that the registrant has not responded, or the relationship with the tag holder has ceased, or what ever. Nominet should then contact the registrant direct, as per Appendix I, part 8 but not contact the tag holder.

If the domain remains with the tag holder after the expiry date, then proceed as per Appendix I, part 8 (also see my comment below on Appendix I, 4).

I think this simple addition will greatly simplify the renewals process for both tag holders and Nominet alike.

2] Un-detagging domains should be charged to the tag holder at the full Nominet rate i.e. £80. This will ensure that tag holder observes the correct procedure.

As an aside, I think any abuse of the Nominet system as described in your white paper (pages 10 and 11), should lead to the tag holder being placed on 'probation'. Another 2 offences while on probation and the tag holder membership of Nominet would be terminated!

I am sure this next comment is controversial but... I consider 2,271 members (taken from <http://www.nominet.org.uk/members/members.html>) to be excessive for the UK market. I would prefer to see that number reduced by improving the standards that each tag holder must uphold.

#### RENEWAL SPECIFIC

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#### QF.13

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I think the default period should be annual. This would tie in with all other ISP/hosting services that tag holders offer and other domain name services e.g. com, org, net. Nominet is the odd one out and this creates confusion to the potential registrant.

For example, say a company wants to purchase company.co.uk, company.net and company.com to protect their name. Doing this from a tag holders web site means offering the .net and .com domains as annual, but the .co.uk domain as bi-annual. It makes far greater sense to make them all annual renewals. It also makes it cheaper for the new registrant to buy multiple domains.

If annual, I suggest the reduced-fee is sufficiently low



enough at present for this also to become annual. This would off-set any increased admin required at Nominet which I am sure would not double, despite the doubling in revenue!

QF.14 ----- I think this should be fixed as annual, though the tag holder could offer longer periods for payment up front.

The issue for the tag holder here is one of automated (web) credit card payments and my example is a real experience:

We offered a discounted rate to a new registrant if they paid for 10 years in advance. Following receipt of funds by credit card (automated on our web site) we purchased the .com domain for 10 years. However later, the registrant claimed the purchase was made without the card holders permission and the funds were withdrawn from our account by Barclays Merchant Services - their policy is that they err on the side of the complainant when there is no signature to approve the transaction. Once we purchased the domain from our supplier, we were not eligible for a refund.

Our policy now is therefore to register domains annually and if the registrant pays for say 10 years in advance, we automatically renew their domain name for them - so we are never out of pocket by more than 1 year should a dispute arise.

QF.17  
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I am afraid the certificates are far too complicated for the registrant to understand. They also arrive far too late - usually 3 months after the date of registration. The 2 most common questions we get (always when a new domain is registered) are:

- 1] Where is my certificate?
- 2] What do I do with the Registration Reply Form?

In the early days, we received so many calls about 2], that we simply set the Registrants' contact details as ours, the tag holder. That way we could fill the forms in ourselves!! That is obviously not correct, but it says a lot about the current process...

Appendix I  
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4. How about taking a Direct Debit from tag holders accounts at the end of each month? The tag holder simply receives a statement.

Of course this depends on my GENERAL 1] comments above i.e.

tag=DETAGGED -don't bill anyone  
tag=DIRECT -contact the registrant directly  
tag=tag\_holder -include in Direct Debit payment (no refunds!)

This forces the tag holder to be a lot more vigilant with the admin of domains under their control. De-tagging would not be used as a form of credit control if it costs the tag holder £80 to un-detag (see GENERAL 1 above).

11. I think this should be set to 30 days to allow other people to purchase the domain. There have been many occasions where a client of ours has waited months for a detagged domain to become available, only to be disappointed. That is unfair on new registrants.

Best regards, brian

Omega Digital Media Ltd

## R13. Claire Civil - Holistech

### *Comments on the Second Draft*

From: "Claire Civil" <claire.civil@holistech.co.uk>  
To: <pab-suggest@nominet.org.uk>  
Subject: Renewals Subcommittee  
Date: Thu, 19 Sep 2002 16:56:18 +0100

Feedback on Version 2.00 of the Domain Name Renewals White Paper

Immediate suspension on renewal date:

There is nothing to be gained for Nominet in suspending a domain on the renewal date if they have not contacted the registrant directly. This will simply give tag-holders a third party to blame as they try to extract renewals from customers, thus bringing Nominet into disrepute. Tag holders agree to take the credit risk, and are already capable of disabling a domain. Nominet should protect it's reputation by delaying suspension of a domain for at least 1 month after it's expiry, sending reminder e-mails once per week during this period.

In our experience the customer centric nature of .uk registrations is a strong factor in deciding which top level domain to register a name in - a few stories of accidentally/unexpectedly expired .uk domains could quickly undo the unique reputation of the namespace. Please consider the indirect impact of such major changes.

Removing recur-bill: tag holder:

As a minimum, please consider retaining the option of automatic billing, perhaps implemented as an automatic "positive renewal" 3 months before the renewal date. The more tag holders that choose this option the fewer customer complaints.

Domain registration is a small part of our relationship with our customers - we know that all domains on our tag should be renewed indefinitely and the current system achieves this flawlessly (we have never needed to query a Nominet invoice).

Positive renewals are just extra administration to us, with the chance that a domain is overlooked. Like many tag holders we will need to automate "positive renewals", and that would be best done at Nominet's side.

Cheers,  
Claire

## **R14. Philip Wade – XKO Network Systems Ltd**

### *Comments on the Second Draft*

From: Philip Wade  
To: "'pab-suggest@nominet.org.uk'"  
Subject: RENEWALS SUBCOMMITTEE  
Date: Fri, 20 Sep 2002 09:40:43 +0100

Hi

I am very much against the "postive renewals" system proposed in Appendix I as it stands.

My opinion might be changed if a modification is made to Step 2 of the model. Would it be possible to e-mail tag holders when names become eligible for renewal, i.e. 6 months before their expiry?

Cheers, Phil

Philip Wade B.Sc (Hons) CCDA CCNA CCA MCP  
Business Networks Manager

## **R15. Gay Aylett – Enterprise AB Ltd**

### *Comments on the Second Draft*

From: gaylett@eab.co.uk  
To: pab-suggest@nominet.org.uk  
Date: Fri, 20 Sep 2002 13:40:18 +0100  
Subject: 'RENEWALS SUBCOMMITTEE'

Domain Name Renewals at Nominet - A White Paper for the PAB

Feedback on A F.6

#### a. Time of Suspension

We are in agreement with all the issues raised under this heading. EAB has an efficient business relationship with the vast majority of its Registrants and therefore is happy with the system we operate of informing Registrants 4-6 weeks in advance of renewal, to ensure we can send their invoice at the beginning of the month of the renewal date. The only changes we would make would be to move everything 4 weeks earlier, so that customer invoices could be sent out the month before the month of renewal, so that EAB can keep within your 30 day credit terms.

If the Registrant is unhappy about this, we would explain that Nominet needed payment before expiry date otherwise the name will be suspended. I believe that the majority of our customers would be happy to pay in advance, as they generally consider the charge is insignificant.

#### b. Winding back of Renewals

This proposal has the potential to cause a lot of trouble. This is mainly due to the fact that Nominet have been so 'laid back' about credit control and providing credit notes in the past. Assuming all Tag holders are able to keep to 30 day credit terms and as long as the current payment status is shown on the whois, there should be no problems with this proposal. We would certainly be more thorough in checking a domain/Old Tag holder/customer, before accepting them onto our Tag in the future.

Gay Aylett  
Enterprise AB Ltd  
Membership No: M00840

## R16. Graham – Firevision

### *Comments on the Second Draft*

Date: Tue, 24 Sep 2002 01:20:23 +0100 (BST)  
From: Firevision <domains@firevision.co.uk>  
To: pab-suggest@nominet.org.uk  
Subject: RENEWALS SUBCOMMITTEE

Hi,

I would like to add our support for the positive renewal mechanism outlined in the white paper, whereby it would be possible to renew via the automaton.

This would be similar to the renewal mechanism in place at many registrars for top level domain names (e.g., Tucows), and it works very effectively in my opinion.

I would envision that the domain name would become inactive upon the 2 year anniversary of the domain name registration should no "Renewal Request" email be received for that domain name. Afterwards, after the fixed amount of time (e.g., 30 days, 40 days, 50 days are commonly used by registries for top level domain names) the domain name would be removed from the database and become available to register anew by anyone that should want it - assuming that Nominet have also performed their contractual obligations.

I would envision that a "Renewal Cancel" automaton message would also be available to cancel renewals of domain names within the same month of the "Renewal Request" email (i.e., before invoicing).

On a side point, would it be possible for Nominet to save on paper costs by printing the lists of domains (either registered or renewed) in two columns on the paper, or even possibly double sided? The new thinner paper is fine though.

Yours,

Graham  
Director  
Firevision Limited  
<http://www.firevision.net/>