

Proposal to NOMINET for creation of a Personal SLD

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A. Introduction

For many years, it has been suggested that a Personal SLD should be created within *.uk*. The origins of this proposal far predate NOMINET. However, there have not, until relatively recently, been clear guidelines, criteria or policy for the creation of new SLDs, nor procedures for proposals or applications to create them.

This document is a proposal, submitted on a personal basis, to create a Personal SLD within *.uk*.

The SLD would be operated by NOMINET, and thus hold the same non-profit-redistributive model as NOMINET does itself.

Registrations in *me.uk* (the proposed SLD name) would (unusually) contain one or two 'dot' character, giving a predilection for *firstname.lastname.me.uk* or *firstname.lastname.identifier.me.uk* registrations. Proposals are incorporated to give individuals (as registrants) somewhat more power to protect their name in the event of dispute than they would otherwise have had. Further proposals cover cost recovery on transfer or change of details, and allow NOMINET to soft-start such a domain.

This document is not submitted for the personal advantage of any individual, but rather for the benefit of the UK internet community. It is strongly suggested it is put to wide consultation. The author will be happy to accept constructive criticism, and, potentially, modify proposals to suit.

B. Definitions

'Personal SLD' refers to the prospective Second Level Domain of *.uk* envisaged by this application.

'Natural Person' has the same meaning as in law, meaning a human being (as opposed to a 'person' which in law may also include other legal entities, for instance companies).

'Policy' refers to NOMINET's policy on the creation of new SLDs.

'Procedure' refers to NOMINET's procedure for the creation of new SLDs

'Rules' refers to the Rules for *.uk*.

'Personal SLD Rules' refers to the specific rules for the Personal SLD.

C. Draft Charter

It is proposed that the Personal SLD is given the designation *.me.uk*¹. The purpose of the proposed SLD is to provide a name-space for potential registrants, where a registration within the SLD is likely to designate a particular individual (a Natural Person) with an association with the UK, just as registration in *co.uk* tends to designate a commercial entity with an association with the UK, and registration in *org.uk* tends to designate some other organization with an association with the UK.

Any legal entity (being a Natural Person, company, partnership or other legal entity) shall be eligible to register with the Personal SLD, provided that the registration complies both with NOMINET's rules, and the Proposed Rules for the Personal SLD.²

D. Statement of Compliance with Policy Rules

The community of interest served by the SLD is Natural Persons, specifically those who have an association with the UK. This is a large community of interest, as it potentially includes all UK citizens, plus a number of other Natural Persons who are not UK citizens.

The SLD is felt to be necessary, as there is no current SLD in *.uk* which best serves the interests of individuals, who are neither commercial organizations (viz. *co.uk*) nor organizations (viz. *org.uk*).

Currently, individuals who wish to register a domain name within an SLD in *.uk* are forced to register in either of these two domains, neither of which give a correct indication of the type of registrant, or alternatively to register as a subdomain of a domain already registered (by some third party, such as an ISP), which is invidious both as it makes the name less attractive, and because of portability issues should the registrant wish to terminate their relationship with their ISP.

A Personal SLD has been mooted many times before (most frequently when no procedure for consideration of new SLDs existed); whilst this is not in itself conclusive proof of the necessity of a new SLD, it is perhaps a good indicator both of the likelihood of necessity, and of its popularity with the community at large.

Whilst it is difficult to estimate the number of registrations within the Personal SLD is unknown, it is likely to be large, perhaps to the levels of several thousand per day.

The new SLD complies with the Policy. Policy Rules 1 & 2 are general rules. Each subsequent policy rule is taken below, in turn.

¹ Other options include *pd.uk*, *per.uk*, though these are, in the author's opinion, inferior.

² Thus it may be concluded that whilst a registration in the Personal SLD may be made by an entity other than a Natural Person, such a registration would (to the rest of the world) tend to indicate the registration was connected with a Natural Person. Bona fide uses of this would, for instance, allow a famous individual's promoter company to register a name in such a manner. Both *co.uk* and *org.uk* are examples of existing SLD's where the charter gives an indication of the type of registrant, but where there are not specific rules to prevent registration by others.

Policy Rule 3

3. *The purpose of an SLD is:*
 - 3.1. *To act as a mnemonic for the Domain Name System; and*
 - 3.2. *To assist identifying the category of eligible registrants in the Domain Name System ("Registrants"); and*
 - 3.3. *To facilitate the location of Internet resources in the UK.*

The name of the Personal SLD currently proposed accurately reflects what an individual might call him or herself ('me'). It is believed that *.me.uk* reflects individuals at least to the same degree as *.co.uk* reflects commercial entities. Alternative suggestions such *.per.uk* or *.pd.uk* also to some extent reflect individuals but it is felt by the author that they are inferior – it is suggested that respondents to the consultation process make their views clear and put preferred alternatives to *.me.uk* to the PAB.

Whilst, as with *.co.uk* and *.org.uk*, any legal entity would be able to register in the Personal SLD, the SLD will aid in identifying the category of eligible registrants (as Natural Persons, as opposed to organizations etc.), as both the Personal SLD Rules, and the name of the SLD, will encourage Natural Persons to register, and, in general, discourage other legal entities – this approach has worked reasonably well for *.co.uk* and *.org.uk*.

This proposal, further, aids identification of the registrant (as the Personal SLD Rules have a predisposition for favouring those registering under their own name), which in turn facilitates the location of Internet resources in the UK.

Policy Rule 4

4. *It is intended that the number of new SLDs created shall be limited to minimise potential confusion in the marketplace. The unnecessary creation of an SLD diminishes the value of the existing namespace in which users have already registered.*

The point is worth repeating that creation of the SLD is felt to be necessary, as there is no current SLD in *.uk* which best serves the interests of individuals, who are neither commercial organizations (viz. *co.uk*) nor organizations (viz. *org.uk*).

Whilst every proposal for a new SLD advocates increasing the number of SLDs by at least one, readers are urged to bear in mind two points:

Firstly, that the community of interest in this SLD is not only large, but also not properly served (see above). Many other potential SLDs (for instance regional SLDs) have constituencies which whilst not served by any single existing SLD, are (largely speaking) served by a combination of existing SLDs. However, this SLD is rare in that it serves a community of interest which is outside the charter of any existing SLD.

Secondly, that the diminution of value of existing namespace will be small, being limited to those users who have registered a personal domain name in a form similar to their name, within another name space. It is arguable that such registrations are in any case outside the charter for those spaces, and thus such diminution should not be considered.

Policy Rule 5

5. *Any new SLD must be:-*
- 5.1. *beneficial to users, or potential users of the UK namespace and the Internet community as a whole ("the Internet Community"); and*
- 5.2. *an appropriate use of limited resources.*

The new SLD will be beneficial to users of the UK namespace by allowing a large and well defined community of interest (Natural Persons) the ability to register their own names, or simple variants thereof, as domain names within the Personal SLD. This will also benefit the Internet Community as a whole, by allowing the domain names of the registrants or potential registrants (it is felt that there will be a new influx of registrants) to be more easily guessed, and more easily located.

It is believed the argument viz-a-viz use of a limited resource has been fully addressed in answer to Rule 4 above.

Policy Rule 6

6. *No SLD shall be created if its uses and functions are wholly or substantially encompassed by the charter of any single existing SLD.*

The uses and functions of the Personal SLD are not incorporated by the charter of any existing single SLD. Moreover, the uses and functions are not incorporated by the charter of any combination of existing SLDs, as Natural Persons, who are the proposed community of interest, are not included within the charter of any existing SLD.

Policy Rule 7

7. *A new SLD shall not normally be permitted where a new SLD with a wider charter would better serve the interests of the Internet Community.*

It is harder to think of a much wider charter than 'serving Natural Persons' without serving the entire internet community, which would not require the usage of SLDs at all. Therefore it is understood the proposal meets this rule.

Policy Rule 8

8. *There may only be two types of SLD:*
- 8.1. *"Third Party Delegated" and*
- 8.2. *"NOMINET Operated".*

The proposal is that this SLD shall be "NOMINET Operated".

Policy Rule 9

9. *If an SLD is Third Party Delegated, control of the operation of the SLD will be contracted by NOMINET to a third party ("the Third Party Registry").*
- 9.1. *An SLD will only be delegated to a Third Party Registry where the Third Party Registry is able to demonstrate it is recognised as a suitably neutral and impartial body by a significant number of potential Registrants in the SLD, and that it can comply with the Policy.*
- 9.2. *A Third Party Registry must act in the interests of the Internet Community as a trustee of the delegated SLD.*

As the domain is proposed to be NOMINET operated, this rule is not applicable.

Policy Rule 10

10. *If an SLD is NOMINET Operated, NOMINET shall retain day-to-day management of the SLD.*

NOMINET shall retain complete (including day-to-day) management of the Personal SLD.

Policy Rule 11

11. *There will be a predisposition towards NOMINET Operated SLDs.*

As the domain is proposed to be NOMINET operated, the predisposition documented by this rule is met.

E. Outline of Proposed Personal SLD Rules

The Personal SLD rules will be an objective, transparent and non-discretionary, in that they in essence constitute a First-Come First-Served (FCFS) system.

However, various minor modifications have been made, in order to:

- Encourage registrations by Natural Persons, rather than corporates
- Discourage domain name speculation, the results of which, it is felt, Natural Persons would be at a particular disadvantage.
- Prevent a 'gold-rush' phenomenon, where all the name-space goes to legitimate, but extremely early registrants, and large amounts of system capacity are required for the first few days of registration
- Cover the costs of transfers and changes of address, as it is felt that these will both be more frequent and, perhaps, more expensive, than with other existing SLDs.

All Registrants in the proposed SLD will be bound by NOMINET's Terms & Conditions for the registration of Domain Names, and Rules for the .uk Domain and its Sub-Domains, in both cases as amended from time to time. In this instance the Rules will thus, by reference, incorporate the Rules for the Personal SLD.

The First-Come First-Served system allows NOMINET to operate, and to be seen to operate, the Personal SLD in a neutral manner that confers no benefit on one Registrant above that which it confers on any other. It is believed that the modifications to the normal FCFS system do not prejudice this ability.

Personal SLD Additional Rule 1 – Predilection for *firstname.lastname* type registrations

A1 The period character ('.') shall be an allowable character in the domain name being registered, and each registration shall contain a string of alphanumeric³ characters, followed by exactly one period character, followed by a string of alpha characters and dashes only. This may optionally be followed by further period and a string of alphanumeric characters that contains at least one number.

For the regular-expression minded reader, domain names are allowable if they match (using case insensitive comparison, without the trailing *.me.uk*):

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^[a-z0-9-]+\.[a-z-]+(\.[a-z0-9-]*[0-9][a-z0-9-]*)?$
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In order to facilitate this rule, the domain name shall be registered within the zonefile of *.me.uk* in full, and no RRs representing the part of the domain name constituting a substring starting to the right of any dot shall be entered into the zonefile for *.me.uk*, by the automaton or otherwise. Thus if *<a>..<c>.me.uk* or *<d>.<e>.me.uk* could be registered (the putative registration), then by implication neither *<c>.me.uk*, *<e>.me.uk*, nor *.<c>.me.uk* could be registered, either prior to, or subsequent to, the putative registration.

Thus *joe.bloggs.me.uk* is a valid domain name, as is *mary.bloggs.me.uk*, but *bloggs.me.uk* is not. Furthermore, no RR records shall be present for *bloggs.me.uk*, and in particular it shall not be delegated via NS records.

It has been suggested that further extensions should be allowed – for instance *billy.joe.bloggs.me.uk*, however, these have disadvantages that a user setting a wildcard MX (for instance) for *joe.bloggs.me.uk* could receive mail intended for *billy.joe.bloggs.me.uk* under a number of circumstances (for instance, if the latter registrants nameservers were off-line). Delegating *billy.joe.bloggs.me.uk* to one set of nameservers, whilst also delegating *joe.bloggs.me.uk* to a second set of nameservers, which may in turn delegate *billy.joe.bloggs.uk* to a third set of nameservers is unlikely to produce a desirable effect.

Consider that *joe.bloggs.2.me.uk* is allowable. It is vital that no possible third part to a domain name could also be a second part to a separate domain name with only two parts, so as to ensure that a domain name of the form *<a>..<c>.me.uk* could not clash with *.<c>.me.uk*. If there were a clash, it would again trigger the problem highlighted above. However, the rules that the third portion of any domain name registered must contain a numeric, whereas the second portion must not, ensure that there is no clash, and thus that no domain name registered can ever be a subdomain of any other.

The third string – possibly conveniently – could be a postcode, a date of birth, etc.

³ Alphanumeric is taken to be the 26 characters a-z (case insensitive), the numbers 0-9, and the dash character.

Examples of allowable domain names:

joe.bloggs.me.uk
joe.bloggs-smythe.me.uk
billy-joe.bloggs.me.uk
billy-joe.bloggs-smythe.me.uk
joe2.bloggs.me.uk
joe.bloggs.007.me.uk
joe.bloggs.sw15.me.uk
joe.bloggs.sw15-2tx.me.uk
joe.bloggs.23-03-71.me.uk

Examples of **not** allowable domain names:

joe.bloggs2.me.uk
joe.bloggs.smythe.me.uk

Personal SLD Additional Rule 2 – Predilection for registrations by Natural Persons of similar name

- A2.1 *If the registrant is a Natural Person, it shall, without exclusion, be considered a sufficient demonstration of lack of bad faith in use or registration, that at the time of use, or registration (as applicable) the domain name was a reasonably faithful representation⁴ of the registrant's legal name, and that the registrant has not changed their name solely to avoid making a registration that would, but not for the change of name, have been considered in bad faith.*
- A2.2 *Notwithstanding A2.1, it shall, without exclusion, be a sufficient demonstration of bad faith in use or registration, if (i) it is shown that the registrant registers or uses the domain name to impersonate or defraud, or with the intent of doing so, or (ii) if the registrant is not a Natural Person, and cannot demonstrate that they registered the domain name with the agreement at the time of a specific Natural Person, and that the domain name was a reasonably faithful representation of that person's legal name.*
- A2.3 *For the purpose of clause 2(a)(i) of the DRS where it operates in relation to a name registered within .me.uk, a complainant, if a Natural Person, shall, without exclusion, be deemed to have rights in respect of a name, if the domain name is a reasonably faithful representation of that person's legal name.*

NOMINET has consulted widely on the introduction of a new Dispute Resolution Scheme (DRS). This is documented at:

<http://www.nominet.org.uk/drs-review.html>

Amongst other areas, this looks at the test of bad faith registration. It is assumed in this proposal that the changes envisaged will be incorporated in a similar form to those circulated in consultation, in which case the DRS in its new form is incorporated into the Rules. This additional Personal SLD Rule 2 gives favour, within the personal domain, to individuals registering domains in their own name. This allows individuals,

⁴ Whilst this test is somewhat subjective and requires application of a certain amount of (non-automatable) common sense, so does the entire bad-faith test in the DRS. Readers should remember that these are rules to be looked at by experts in the event of dispute, and not rules for (automized) registration.

who happen to have the same name as intellectual property holders, the right to register their own domain names (perhaps a Mr Jim Beam, or similar).

The author would welcome comments to the PAB from the Intellectual Property community, as well as from NOMINET's in-house legal advisors, on this additional rule in particular, including proposals for modification.

Personal SLD Additional Rule 3 – Ability to recover costs for transfers and change of details

- A3.1 Except as listed below, the charges for registration in the Personal SLD shall be the same as within .org.uk, unless otherwise subsequently determined by NOMINET in the manner of its normal process for changes in charges.*
- A3.2 On transfer, the remaining term of registration shall be cancelled, and the renewal fee shall be immediately due. NOMINET shall only process the transfer on receipt of the renewal fee, which shall renew the domain for the period then in force, starting at the time of transfer. Where completed documentation, fully in order, is provided to NOMINET's satisfaction by a member, the renewal fee shall be at the discounted level, else it shall be at the undiscounted level.*
- A3.1 NOMINET reserves the right to charge an administrative fee for processing change of address details in a manner other than via the automaton.*

It is felt that transfers and change of address details are likely to be more prevalent than in existing SLDs.

The first subsection of this rule addresses transfers. This also (in part) helps address the problem of domain warehousing⁵. The second gives NOMINET the right to charge an administrative fee for change of address details where not performed automatically.

It is suggested that this rule might have wider applicability than the Personal SLD.

Personal SLD Additional Rule 4 – Ability to provide a soft start

- A4 NOMINET reserves the right to make domain registrations in the Personal SLD available in stages subsequent to public launch of the new SLD, so long as each possible domain name is made available on a First Come First Served basis. NOMINET reserves the right to penalize those tagholders submitting applications for domain names which are unavailable.*

It is felt that there is a risk that on opening the new SLD, there might be a large volume of initial applications. This holds two risks: Firstly, that very early applicants may benefit, at the expense of the public at large. Secondly, that the load might be so large as to cause NOMINET's internal systems problems.

⁵ Though it is unlikely to help with 'vanity names' which may command far more than any transfer fee.

A proposed mechanism of enforcing this scheme is detailed below:

1. An Introductory Period, with an announced length, which may be varied by NOMINET within preagreed limits, depending on operational load, shall be announced, during which the Personal SLD shall be active, but a not all domain names shall be available for registration.
2. During the Introductory Period, domain names shall become available for registration in an unpredictable and pseudo-random order. Those not yet available shall be so marked (NYA).
3. During this period, the whois server shall, when queried about an NYA domain name, return that the domain name is NYA. The whois server shall be rate-limited in the normal way. More than a given number of queries from a particular host in a given time period shall give no response.
4. During this period, tagholders who in any 24 hour period attempt to register more than (for example) 10 NYA Personal domain names shall have further registrations of Personal domain names returned for the next 7 days. NOMINET shall police applications for new tags to ensure that they are not simply to avoid this rule.
5. Each potential domain name shall have a sequence number attached to it, the number and the exact mechanism of generation of which shall be kept secure by NOMINET during the Introductory Period, by means of keeping their encryption key and number N (see below) secure. The sequence number shall be generated by encrypting the domain name with a fixed key, by performing a known hash function on the result, and by taking the modulus of the hash with respect to a fixed number N . The result of this mathematical process will be that each possible domain name will have a sequence number x associated with it, which will be between 0 and $N-1$, but that the sequence number will not be able to be determined outside NOMINET. The encryption key, and the number N shall be published by NOMINET at the end of the Introductory Period to ensure fair play.
6. NOMINET will release the domain names in ascending order of sequence number, starting by allowing registrations of domain names with sequence number 0, then sequence number 1, etc. It is suggested that this is initially done at a fixed rate – for instance if NOMINET released one sequence number per minute, with N set to 100,000, this would release the entire pool in about two months. Provided the entire pool is released within the time span allotted, NOMINET should be free to ‘turn on and off the tap’ as it wishes, to cope with operational load. As the sequence numbers will be evenly distributed, NOMINET can control the rate of additional registrations. During the process, NOMINET should periodically publish an approximation to a ‘percentage complete’ number, being the fraction $a/(N-1)$ where a is the highest sequence number currently permitted for registration .
7. During the introductory period, tag-holders will be incented not to register domains which they have not first checked, through the whois server, are not NYA (i.e. they will only register domains which they have first checked are available). They achieve very little by hammering the whois server. Provided the encryption and hashing mechanism are sufficiently secure, it will be very difficult to guess when (other than ‘by the end of the introductory period’) a given name will be available.
8. It is felt likely that this solution will, to some extent, transfer FCFS load to enthusiastic registrants. There is no reason why registrants should not query particular names (on behalf of clients) a reasonable number of times per day (but not sufficient to cause the whois server problems), and as soon as that domain name ceases to be NYA, to send in a registration. Presumably they would charge clients a premium for this service.
9. Obviously it is vital that all tagholders have the opportunity of equal access to the whois server.

Whilst this model is far from flawless, it does provide the possibility of a ‘soft start’.

Effect of First Come First Served Model

If a Mary Bloggs of Newcastle registers *mary.bloggs.me.uk*, then it will naturally become unavailable should Mary Bloggs of Cambridge subsequently wish to register it. This is in the nature of FCFS systems. Domain names such as *mary.bloggs.2.me.uk*, *mary.bloggs.cb3-9et.me.uk* would be available to subsequent registrants.

The system does not attempt to differentiate between who might be the ‘most valid’ Mary Bloggs.

This means there is likely to be an ‘aftermarket’ in vanity domain names created. It is envisaged that speculators may attempt to register large numbers of domains of the form *firstname.lastname* with popular combinations of names. It is an open question as to whether this speculation is undesirable. It is clear that it is unlikely that intellectual property is being infringed if only common names are used – this seems to the author little more undesirable than (say) the DVLC auctioning vanity number plates. Given the ability to use meaningful third parts (such as postcodes and dates of birth) it is questionable as to what premium such registrations would attract in any case.

F. Background on the Author, Disclaimer, and Copyright

Alex Bligh is a founding non-executive director of NOMINET UK, and sits on the Policy Advisory Board. He holds the post of Senior Technology Officer at XO Communications Europe, having previously served as Vice President of Core Network at Concentric Network Corporation Inc, and, before that, as Chief Technical Officer of Internet Technology Group PLC (“ITG”). He was Managing Director and founder of Xara Networks Limited prior to its acquisition by ITG in April 1997. Alex is also a founding non-executive director of Redbus Interhouse PLC, is a founding non-executive director of XchangePoint Ltd, a technical advisor to i-Spire PLC, and also serves on several other industry bodies. Alex was a non-executive director of the London Internet Exchange for 4 years. Alex holds a BA in Mathematics and Management Studies from Queens’ College, Cambridge.

This proposal is submitted in a personal capacity, and does not necessarily represent the opinions of any of the above mentioned organizations.

It is the author’s belief that he has no identifiable personal gain to be made from NOMINET’s adoption of this proposal in its current form.

Notwithstanding the above, the author recognizes that it may be considered that there is a conflict of interest in the author’s position as submitter of the proposal, and as a member of the NOMINET PAB and CoM. Whilst the author does not feel that such a conflict of interest exists in a material manner as the author has no particular personal interest in the success or otherwise of the proposal, the author hereby offers to abstain from any vote at either the PAB or the CoM should the chairman of the relevant meeting determine that there is a risk that such a conflict risks being material, or being perceived to be material.

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protection of intellectual property is to make it more difficult for proposals of a similar nature, but for commercial benefit, to take advantage of the author's work.

G. *Process and Consultation*

The formal NOMINET procedure demands that the application for this SLD be first submitted to the executive for vetting, as described on the NOMINET web site:

<http://www.nominet.org.uk/nominet/newslds.html>

This procedure includes copious opportunity for formal public consultation after reception of the proposal by NOMINET.

Readers of this document are **encouraged by the author to participate** in this process, by filing "Observations".

The NOMINET PAB are encouraged to make maximal use of their powers to consult with the public, and not to be reluctant to propose changes to this proposal.

NOMINET has not made it entirely clear how Observations are to be filed in advance of publication by NOMINET on its web site of this proposal. To give maximum time for participation by members of NOMINET, and the general public, the author has posted this document in public prior to this, and provided an **additional mechanism for feedback**, which will be read by the author, and, normally, unless requested to the contrary, passed to NOMINET later. This should not be viewed as either a substitute for NOMINET's formal consultation, or as a democratic process in itself. Both of these two elements are included within NOMINET's formal procedure.

Any comments sent to the author at the address below will be considered. Unless correspondents note otherwise, it will be assumed that the correspondent permission for republication, and for incorporation into modifications of the proposal, with appropriate attribution. Unless correspondents note otherwise, it will be assumed that the correspondent gives permission to forward his/her comments to NOMINET, and gives permission to NOMINET to treat them as they would any other "Observation". Correspondents are urged to ensure any comments incorporate note the capacity in which they write. Please address comments to the following address, in plain text email only:

personal-sld@alex.org.uk

A copy of this document can be found as a link from:

<http://www.alex.org.uk/personal-sld/>

[ENDS]