

Registry Product improvements: Extensible Provisioning Protocol (EPP) Standardisation.

Executive Summary

We have received registrar feedback over the years that the technical differences between the .UK registry and other top-level domains makes .UK harder to both integrate with and for registrars to provide support to their customers. Furthermore, those customers can struggle with nuanced differences in experience between what is otherwise a similar product.

The technical differences are driven by differing technical and policy choices with largely aligned intent that were made by different top-level domains on parallel timelines.

The draft proposals that follow propose an approach in which that the .UK namespace could move towards an aligned technical implementation.

Introduction

This document is not a finalised proposal, but a starting point for discussion with significant thought put in and at a stage where community input will help guide a final proposal and policies that can be widely consulted upon. Nominet intends to root any final proposal in a positive operational user experience for both registrants and registrars within the international eco-system of how domain names are sold and maintained.

Background

When Nominet was founded in 1996, the .UK registry operated via a PGP signed email to the 'Automaton'; in 2008 a bespoke EPP implementation was launched that ran alongside the Automaton. In 2012 and 2013, Nominet made some standardisations to the EPP schemas it utilises, but all of this was done within the remaining constraints of policy and operations that existed at that time. In 2014 Nominet launched the .cymru and .wales Top Level Domains (TLDs) which utilise standard EPP, and started to provide Registry Services, utilising that .cymru and .wales platform for other TLDs. In 2021, Nominet added industry standard EPP statuses to the .UK supported schema to give registrars visibility of restrictions on domains but the EPP implementation remained within existing policy. The planned changes to support a new domain drops mechanism bring .UK closer to standardisation, as do the updates to our internal registry management tools for .UK which will benefit registrars through enhanced self-service later this year but these stop short of any wholesale changes.

A number of registrars have raised frustrations in relation to the current .UK platform implementation and its interoperability with other systems, such as off the shelf EPP clients or third-party billing systems that integrate directly with EPP. Most of those implementation artefacts relate to policy choices that pre-date EPP's existence as an internet standard and are

baked into our policy and business implementation from the early days. In a recent Nominet community discussion, the Product Team confirmed the intention to standardise .UK EPP, and committed to putting together this draft, to offer some potential solutions to amend the policy barriers.

Nominet is placing more emphasis on a Product led approach, which involves more focus on user experience as well as the benefits or drawbacks of different processes. In considering the needs of registrants and registrars we want to enable:

- Registrars to support their registrant customers directly – Nominet's processes should generally be either oversight to protect the registrant from a bad actor registrar, or functional to support good actor registrars.
- Registrars to be able to use industry standard EPP clients in .uk allowing for industry standard integrations and lower registrars internal costs in supporting multiple TLDs.
- Processes to be more easily understood by registrars and registrants; especially where someone might have multiple domains registered in different top-level domains, differences should only exist where value is added to the eco-system.
- Building a healthy registrar ecosystem in the UK by allowing .uk registrars to build their skill sets to be able to support global standard EPP enabling them a foot up onto the international registrar stage making the jump to becoming ICANN accredited smaller.

The proposal made below is one of the most extensive set of changes proposed for the .UK registry since Nominet was founded. They have been driven by a variety of key areas of input from registrars over many years, combined with the learnings Nominet has through our participation in the gTLD environment as both registry and registrar. The proposals included here are themselves interlinked to provide a coherent operational environment.

1. General EPP restrictions
2. Use of DELETE command
3. AUP removal for Investigation Lock
4. Inter-Registrar transfer process
5. .UK Lifecycle
6. Tag Types
 - a. Current approach
 - b. Propose approach
7. Terminology

General EPP restrictions

There are a number of general restrictions made of .UK EPP such as the inability to perform domain:info commands on other registrars' domains which are non-compliant with standard EPP. The restrictions relate to the gaming of the existing drop process and the secretive nature of the drop time.

While changes in this area are not on our critical path for completing the changes to the drop process; we do fully expect to be able to standardise after this work is complete.

Contact Organisation field – today .UK utilises this field as the 'registrant' of the domain. If the field does not exist, the data from the name field is populated into the field. This field is therefore not editable by some tag types. This is at odds with the way others would usually understand the registrant of a domain where the contact data as a whole confirms the registrant entity; if the Organisation field is populated then it is the registrant and if it is not the contact name is.

Proposed new approach for Contact Organisation field:

1. Nominet will not auto-populate the organisation field where it does not exist and will instead take an understanding of the legal entity that is the registrant through the complete contact object data.

Use of DELETE command

We have had several requests from registrars for the ability to use the 'Delete' command on domains to support their customer's needs.

Current .UK policy recognises a registrar as having agency for a registrant in creating and making most changes to a domain (however critical to its functioning), but limits their agency when it comes to deleting domains except in some specific circumstances, such as prior to first invoicing.

In general, for a domain to be deleted at any time other than the end of its lifecycle a registrant must contact Nominet directly and utilise Nominet's Online Services to cancel the domain. Currently cancelling the domain will result in the immediate release of the domain and make it available for re-registration. This approach has been in place since the early days of Nominet and prior to EPP or registry grace periods existing in gTLDs.

Current User experience

There are a few key aspects from a user experience perspective that impact a registrant when they wish to give up their registered domain:

1. The registrant selected their registrar for their service but a registrar is not currently able to provide a complete end to end service to their customers. e.g. registrars cannot currently delete a domain unless they have not yet been invoiced for that domain.
2. The registrant needs to become aware of how to engage with Nominet directly and then:
 - a. Often contact Nominet support team asking how to arrange the deletion of domain.
 - b. Support team direct them to login to online services with the email address the domain was registered with and
 - i. if this was the first time they logged into online services they must first of all set their password.
 - ii. Navigate the domain manager, often for the first time, to choose the domain they wish to cancel and select that, resulting in the immediate scheduling of a domain to be deleted within approximately 24 hours. (If

the registrar has not yet been invoiced by Nominet this approach will not be available and they must go back to the registrar.)

3. If it turns out that the deleted domain was still required, the registrant needs to then re-register the domain to solve the problem and reach out to a registrar to do that.

How does the wider industry deal with these problems?

In gTLDs:

1. Registrars are able to send an EPP delete command at the request of a registrant, meaning the registrant's experience of deletion matches the choice they have made elsewhere.
2. When a delete command is sent the domain enters a 'Redemption Period' which stops the domain functioning immediately, but the domain remains registered to the registrant and can be eligible to be 'restored' for a period (typically 30 days).
3. When a domain is restored, it is returned to its pre-deletion state at the registry.

Nominet recognises that the current registrant and registrar user experience could be improved upon and proposes the following new process aligned to the wider industry:

1. Deletion:
 - a. Registrars may delete a domain that is not subject to any registry mandated 'delete prohibited' lock at any time on the:
 - i. explicit request of the registrant.
 - ii. failure of the registrant to request and pay for the renewal of the domain that is in a registry auto-renew period. (N.B. auto-renew does not currently exist, see Lifecycle proposal.)
 - iii. identification of abuse in relation to the domain which is in breach of the registrar's abuse policies and which the registrant is unable to, or has failed to remedy.
 - b. When a domain is deleted by a registrar it will enter a 30 day 'Redemption Grace Period' during which a registrar may, subject to the Restore process, restore the domain.
 - c. At completion of the 'Redemption Grace Period' the domain will enter a 5-days 'Pending Delete' period where the name is no longer available to the registrant to restore and at the end of this period the name will cease to be registered.
 - d. Domains which are deleted during one of the following Grace Periods will obtain a refund of any charges for the associated transaction:
 - i. Add Grace Period, subject to Add Grace Period Limits.
 - ii. Renew Grace Period.
 - iii. Auto-renew Grace Period.
 - iv. Transfer Grace Period
2. Restore:
 - a. A registrar must offer a registrant the option to Restore their domain if it is in redemption period.

- b. A registrar must not make it any harder for the registrant to request a restore than it is to make an update to a domain name.
 - c. Domains which were deleted during a grace period and have therefore had the charge for a transaction cancelled will be re-charged for that transaction.
 3. Add Grace Period Limits (replacing the AUP constraint on use of the delete command)
 - a. During any given calendar month, a registrar may delete and receive a refund for names in add grace period for the greater of:
 - i. 50 domains; or
 - ii. 10% of their net new creates that month.
 - b. When that limit is reached the deletion request will still be successful, but a refund will not be automatically applied. Nominet may, on request, grant exemptions to this limit in extraordinary circumstances.

Investigation Lock Limits

There is currently a single 'Acceptable Use Policy' covering '[Use of the delete and investigation lock operations](#)' – the section in relation to the 'use of the delete command' proposes the replacement in relation to 'delete', this section covers the remainder of that acceptable use policy.

Nominet's registrar 'Investigation lock' is intended to be used on registrations that are being investigated for abuse. The lock on newly registered domains is limited to 5 or 5% of new creates for that registrar. This has its basis in early versions of Investigation Lock which resulted in the deletion of the domain after a period. Deletion does not happen automatically in the current version and the lock only sets EPP 'server' statuses.

Investigation lock vs client statuses

Nominet recognise that registrars deal with abuse across many top-level domains on a day to day basis, and differences in the technical implementation can add unneeded complexity. Registrars can use EPP client statuses to deal with abuse instead of the investigation lock, Nominet explicitly permits this. The only difference in effect would be that client* statuses do not prohibit the registrant transferring the domain via a paid transfer in Nominet online services.

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

Proposed updated Investigation Lock policy:

- Remove the limits on the use of 'Investigation Lock' so that it can be applied to all domains which meet the criteria of its usage and abuse can be investigated in all cases.
- Make no other changes to its usage at this time to minimise change for registrars; this functionality will be reviewed in greater detail at a later date in relation to abuse processes.

Inter-Registrar Transfer Process

The current .UK inter-registrar transfer process is not directly compatible with standard EPP, nor is it as secure as it could be.

.UK policy provides for a push process where either:

1. The existing registrar must 'push' the domain to a new registrar's accreditation; or
2. The registrant must 'push' the domain to a new registrar's accreditation via Nominet's online services.

The gaining registrar has the ability to configure whether or not they need to authorise accepting the domain.

If a registrar accepts a domain onto their TAG/accreditation, then it is both possible and not uncommon that they cannot match up the incoming domain with an expected user in their system. This means the domain sits in-limbo at the registrar until the registrant identifies themselves by submitting the request to the new registrar. While not common, a third party can then contact the new registrar and may be able to intercept the domain in this scenario.

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

The current .UK inter-registrar transfer process does not amend the expiry date of a domain and is done at no cost, whereas the EPP standard can support a transfer with or without renewal. The usual implementation for gTLDs is to mandate a minimum of single year renewal on completion of transfer. The industry standard RFC5731 EPP Domain Name Mapping standard can support both approaches with a pull transfer mechanism.

Proposed updated Inter-registrar Transfer approach:

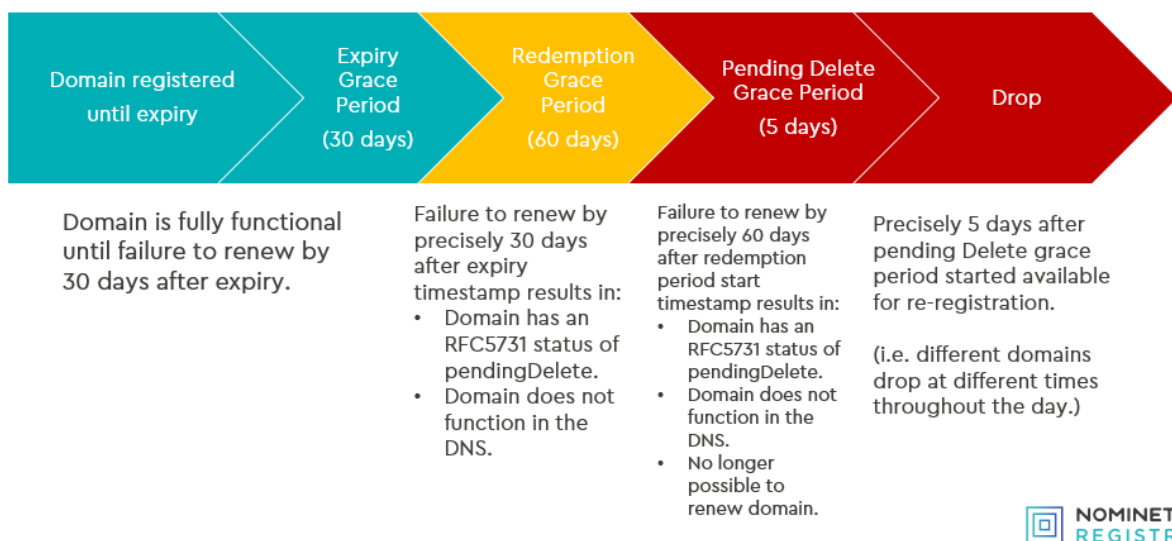
1. Replace the "push" inter-registrar transfer process with a "pull" process.
2. The current/losing registrar:
 - a. may set the EPP status "clientTransferProhibited" as part of their normal security practices to prevent a transfer request.
 - b. On request by the registrant to transfer a domain to another registrar:
 - i. must remove "clientTransferProhibited" EPP status.
 - ii. Set in the registry and provide a valid "authorisation code" for the domain to the registrant via a secure connection.
 - c. May 'reject' a transfer request only if they reasonably believe the current registrant has not authorised the request. Any information leading to this conclusion must be shared with the Nominet compliance team if they request it.
 - d. Should 'accept' a transfer promptly where requested to by the registrant.
 - e. Not accepting or rejecting a transfer within 5 days will result in the domain automatically completing the inter-registrar transfer.

- f. On completion of the transfer away, and solely at the request of the registrant, the losing registrar may dispute the transfer by raising a ticket with Nominet's compliance team.
3. The gaining registrar must:
 - a. only submit a transfer request after contracting with the registrant and any request must include:
 - i. Domain
 - ii. Authorisation code
 - iii. Optionally, a period of 1 to 10 years:
 1. If a period is provided the domain will be renewed for that period on completion of transfer and the renewal cost will be charged.
 2. If no period is provided the domain will not be renewed as part of the transfer and the existing expiry date will remain.
 - b. If requested, share with Nominet's compliance team any data required in order to reasonably investigate a disputed transfer.
 4. Nominet will provide a backstop escalation service where the registrant may:
 - a. raise a compliance case against the losing registrar for failure to remove "clientTransferProhibited" and/or provide an authorisation code on request
 - b. Dispute an inter-registrar transfer which has completed.

.uk Lifecycle

The recently agreed changes for the .UK drop process when implemented will result in a new lifecycle and are shown in the following diagram:

.uk lifecycle after drop list changes



Registrars have fed back over the years that the substantive difference in lifecycle model causes confusion for registrants who have domains from multiple registry operators leading to an increased support burden.

The remaining substantive differences between our post-drop lifecycle model change and a standardised EPP lifecycle approach as used in gTLDs are:

1. 'Add grace period'
 - a. In .UK it is until the invoice process runs which means it is a variable time limit
 - b. in gTLDs it is typically 5 days.
2. 'Auto-renew' on expiry model
 - a. .UK utilises a positive renewal model requiring a registrar to submit a renewal request.
 - b. gTLDs utilise a registry auto-renew model at the registry with a grace period with positive renews required by the registrant at registrar. (i.e. registrar must get paid to renew a domain or send a command confirming they are not renewing it.)
3. DNS disruption:
 - a. .UK disrupts DNS 30 days after expiry.
 - b. gTLD:
 - i. registries disrupt DNS at the point where the domain enters redemption period.
 - ii. registrars are required to disrupt the DNS after expiry date but before deletion to redemption period to encourage renewal.
4. [RFC3915](#) grace periods:
 - a. .UK lifecycle is not compatible with grace period definitions;
 - b. gTLDs implement them as their lifecycle is compatible.
5. Notifications
 - a. In .UK today Nominet notify registrants by email when their domain:
 - i. expires.
 - ii. is suspended for non-renewal.
 - iii. is purged from the registry.
 - b. In gTLDs generally speaking registries do not contact registrants directly.

Note: The new drop process planned for later this year will have drops complete in relation to the start of the redemption period which is the start of the deletion process and under the current lifecycle this stage relates to the create date. If we adopt a standard lifecycle the redemption period start time will relate to the 'delete' command being sent by the registrar.

Nominet propose to implement:

1. an auto-renew model at the registry where on expiry:
 - a. the domains expiry date will wind forward 1 year.
 - b. an 'Auto Renew Period' will be shown on the domain.

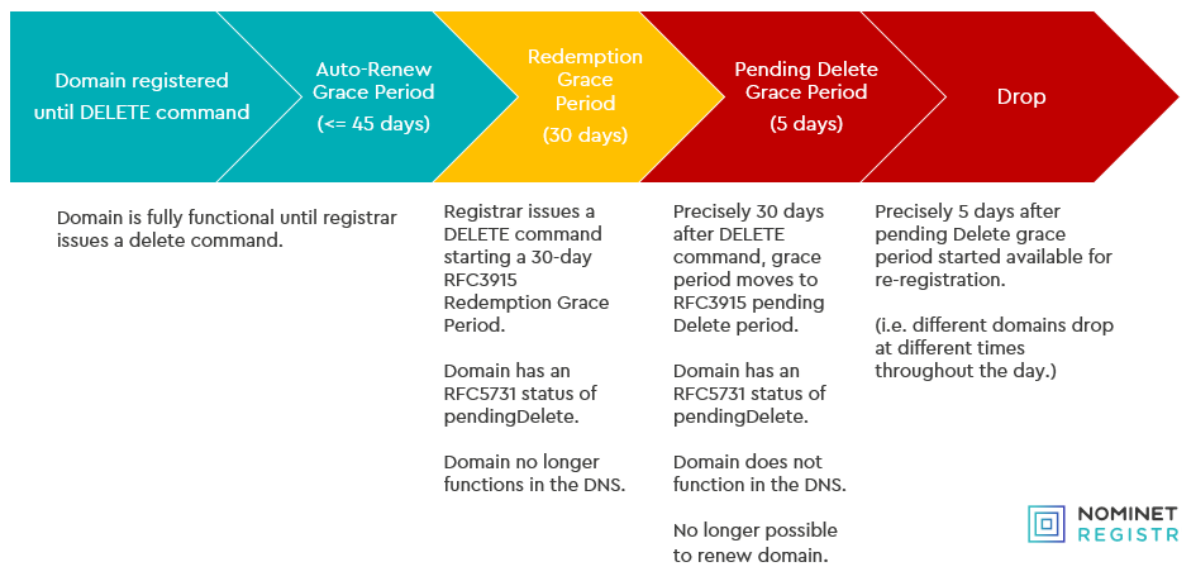
- c. If during that auto-renew period a registrar issues an EPP renew command where the expiry date provided in the request matches the expiry date:
 - i. before the auto-renew, then the renewal will be converted to a manual renew.
 - ii. after the auto-renew, then the renewal will be treated as an additional period to the auto-renew.
- d. Transactional billing for auto-renews:
 - i. Credit:
 - 1. The cost of an auto-renew will be deducted from the available credit at the time of auto-renew even if it takes the registrar past their credit limit.
 - 2. If a domain is deleted in the auto-renew grace period, the charge will be released to available credit.
 - ii. Transactions will only be invoiced at the end of their grace period when they have become finalised (e.g. at the end of the auto-renew grace period.)
- 2. a requirement for registrars to have had a renewal request from the registrant for a domain to be renewed.
 - a. If no renewal request is received a registrar must issue a 'delete' command during the auto-renew grace period unless extenuating circumstances exist.
 - b. If extenuating circumstances exists a registrar may renew the domain at their own cost but must keep a record of those circumstances which can be shared with the .UK compliance team.
- 3. Registrars should not disrupt the DNS during the auto-renew grace period, as disruption will happen at the point of entering redemption period. Note: this is spelt out to indicate we are not proposing to require the same approach as ICANN. The provision of DNS itself is not subject to the Nominet Registry Registrar Agreement and we are not seeking to expand to include it.
- 4. RFC3915 registry grace periods for .UK with the following terms:
 - a. Add Grace Period: 5 days
 - i. Create refunded if domain is deleted in this grace period subject to limits on refunds.
 - b. Renew Grace Period: 5 days
 - i. Renewal refunded if:
 - 1. 'unrenew' command is used.
 - 2. Domain is deleted in this grace period.
 - c. Auto-renew Grace period: 45 days
 - i. Auto-renew refunded if domain is deleted in this grace period.
 - d. Redemption Grace period: 30 days
 - i. Proposed 'RESTORE' fee will be £0 but will appear on invoices to aid clarity.
 - e. Pending Delete Grace period: 5 days
 - f. Transfer Grace Period: 5 days
 - i. Option to 'unrenew' where the registrar has requested renewal as part of the transfer process.

5. Email notifications:

- a. no longer email registrants at expiry as the process would now be to auto-renew.
- b. Continue to email a registrant when a domain enters 'redemption Period'.
- c. Instead of emailing at the time of purging the domain, email when the domain enters the 'pending delete' grace period as that marks the point of no return for the domain.

The resultant lifecycle would match gTLDs:

Proposed .uk process



Tag types

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

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

The TAG types available are:

- Accredited Channel Partner (ACP)
- Channel Partner (CP)

- Self-Managed

In the case of ACPs and CPs the intent behind this distinction was to offer greater flexibility and functionality while allowing a registrar to choose what level of responsibility they wished to accept. The self-managed TAG was designed to reduce the burden on registrars who only managed domains on their own behalf.

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

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

Customer Service		
Accredited Channel Partner	Channel Partner	Self-Managed
Maintain a website, accessible to the public that provides: <ul style="list-style-type: none"> • Address • Telephone number • Customer service commitments detailing expected response times and how long it usually takes to resolve issues • Email contact point for abuse complaints Acknowledge receipt of customer contacts or complaints within 3 working days Ensure your customers are aware of: <ul style="list-style-type: none"> • Charges for registration, renewal and maintenance • Any ongoing charges • Key terms of contract • Your policy on renewal and expiry of domain names 	As per Accredited Channel Partner except acknowledgement of contacts or complaints is within 5 working days.	If services are provided to a third-party then as per Channel Partner. If service not provided to third parties not applicable.

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

Data Validation		
Accredited Channel Partner	Channel Partner	Self-Managed
	Registrars are restricted from being able to amend the 'Organisation' field on a contact object.	

Functionality and Benefits		
Accredited Channel Partner	Channel Partner	Self-Managed
<ul style="list-style-type: none"> On behalf of your customers, you may transfer domain names to a new registrant free of charge. Ability to make corrections to registrant name. Ability to opt out of certain types of automated notifications that we currently send to your customers. Functionality to delete domains suspended for poor data quality. Ability to transfer expired domains with customers express permission. Eligible to apply to operate a Proxy Service within the Nominet Proxy Service Framework. 	<ul style="list-style-type: none"> No additional requirements/benefits. 	<ul style="list-style-type: none"> Domain Names must usually be registered only in the name of the registrar. You may specify five registrant names at any one time which will be regarded as being your name. These must be linked to you in some way. You may transfer domain names on a Self-Managed tag to a new registrant free of charge.

Marketing and Communications		
Accredited Channel Partner	Channel Partner	Self-Managed
<ul style="list-style-type: none"> Eligibility to apply for on-going promotional activities and programmes. Right to use the Accredited Channel Partner logo. Identified as holding Accredited Channel Partner tag on Nominet website(s). 	<p>Not Applicable. (Some promotional activities have been made available despite this.)</p>	

Restrictions		
Accredited channel Partner	Channel Partner	Self-Managed
<ul style="list-style-type: none"> Multiple Accredited Channel Partner tags allowed. 	<ul style="list-style-type: none"> Multiple Channel Partner tags allowed. 	<ul style="list-style-type: none"> Only one Self-Managed tag per registrar.

The .UK Registry-Registrar Agreement covers all types of Tags.

Proposed new approach

We believe there would be significant benefit to registrants and registrars in removing the functional differences between TAG types and enabling more functionality for all registrars.

Customer Service
<ul style="list-style-type: none"> Where a registrar is providing services to: <ul style="list-style-type: none"> Only themselves <ul style="list-style-type: none"> there will be no customer service requirements. third parties then: <ul style="list-style-type: none"> they must be able to demonstrate that through their normal course of business they make easily accessible to their customers, ideally via a public web site: <ul style="list-style-type: none"> Their contact address, telephone and customer service commitments which detail expected response and resolution times. they must ensure customers are aware of: <ul style="list-style-type: none"> Charges for registration, renewal and maintenance on domains. Any ongoing charges. Key terms of contract. The policy on renewal and expiry of domain names. Provide a contact point for abuse reporting. Acknowledge receipt of customer contacts or complaints within 5 working days.

Data Validation
<ul style="list-style-type: none"> We will perform a wider review of our data validation processes as we improve our internal systems and to that end we do not propose making any functional changes at this time. To de-couple the timeframe of that review we propose each TAG will be able to choose to be treated either as: <ul style="list-style-type: none"> an 'ACCREDITED CHANNEL PARTNER' is today. a 'CHANNEL PARTNER' is today. Following the unification, TAGs will automatically be allocated based on their current TAG type, with the ability provided to change this at any time

Functionality and Benefits

- With the express consent of the registrant, you may change the registrant on a domain free of charge.
- Ability to make corrections to registrant name.
- Ability to opt out of certain types of automated notifications that we currently send to your customers.
- Ability to delete domains subject to terms and conditions.
- Eligible to apply to operate a Proxy Service within the Nominet Proxy Service Framework.

Marketing and Communications

- Eligibility to apply for on-going promotional activities and programmes.
- Right to use an Accredited Registrar logo.
- Identified as a registrar on Nominet website(s).

Restrictions

- Multiple registrar accreditations allowed per legal entity.

Terminology

There are some aspects of terminology that have been developed in Nominet which are referred to differently across the industry. We propose standardising the lexicon to reduce complexity for registrars and registrants.

- TAG

Nominet's 'TAG' terminology relates directly to the original Automaton implementation. Today from an EPP implementation perspective it acts as the industry standard Client Login ID (CLID) for the registrars 'accreditation' for the majority of purposes.

The existing 'push' transfer process requires registrants to inform their current registrar of the TAG they wish a domain pushed to for their new registrar and therefore it remains more visible that it needs to be; potentially confusing users.

Given the proposal to alter the transfer process to a 'pull' process we envisage ending the references to 'TAG' and instead referring to an 'Accreditation' which is more widely understood across the industry.

- TRANSFER

Nominet have historically used the term 'transfer' ambiguously when it comes to domains.

In the 'Registry Registrar Agreement' we refer to both 'transferring' domains to a:

- new registrar; or
- new registrant

More commonly across .UK registry documentation and approach 'transfer' is usually focussed on the meaning of 'change of registrant'.

The EPP RFCs define 'transfer' commands to act as part of the inter-registrar transfer process – this is the more commonly used terminology across the industry.

We propose updating the .UK lexicon so that:

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

- Accredited Channel Partner / Channel Partner / Self-Managed

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

Summary

As indicated this document covers current thinking from Nominet's product team in relation to feedback received from registrars and registrants over the years. We are keen to test this thinking with registrars in the first instance and are looking for early feedback on our direction of travel. We do not think the proposal is yet complete because it would benefit from feedback.

Next Steps

1. UKRAC discussion of this paper for some high-level feedback.
2. Nominet product team expect to hold some open roundtable sessions which will be announced in the coming weeks, we would like both the UKRAC and registrars more generally to read the detail proposed; join our roundtable sessions and discuss the proposal on the Nominet community.
3. Based on feedback received in these sessions; Nominet will revise the proposals; and put forward revised plans of our functional approach, including a policy proposal which will enable a formal policy consultation involving wider stakeholders and the UKRAC.