

.UK Standardisation – what have we heard so far?

FEBRUARY 2022

Updates published: <https://registrars.nominet.uk/proposals/proposal-for-uk-epp-standardisation/>

In April 2022 the product team put forward a discussion paper proposing wide ranging changes to the .UK platform. The changes were designed collectively to address a range of historic feedback heard over many years and also utilise our learnings from operating generic top level domains. This document summarises feedback received so far (before, during and after the round table call) on the [proposals](#) themselves. All feedback will be utilised in revisions of each of the proposals.

STRUCTURE OF THIS DOCUMENT

Each of the sections will make a brief reference to the proposed change, followed by the various different views that have been heard – if you have views not represented amongst them, please let us know – we need your input to ensure the final proposed approach takes all registrars into consideration. Where we carried out a ‘straw poll’ on the round table call to determine splits of views we have included those here too. We then provide a summary of our current thinking based upon known facts and what we have heard and next steps for each of the areas.

OVERARCHING FEEDBACK

There have been some strands of feedback that are more over-arching than based on individual parts of the proposals.

- For registrars that operate technical integrations:
 - there is a short-term cost of technical change.
 - across multiple TLDs, there is an opportunity to utilise a single code base resulting in long term savings in maintenance.
- For registrars that do not operate technical integrations:
 - there is a continuing wish to not be required to operate technical systems to maintain registrar infrastructure.
- If we make any significant changes, there will be a need for re-education.
- There is an opportunity to utilise international registry technical standards while improving upon the business rules experienced across the industry.

⇒ Nominet’s summary position:

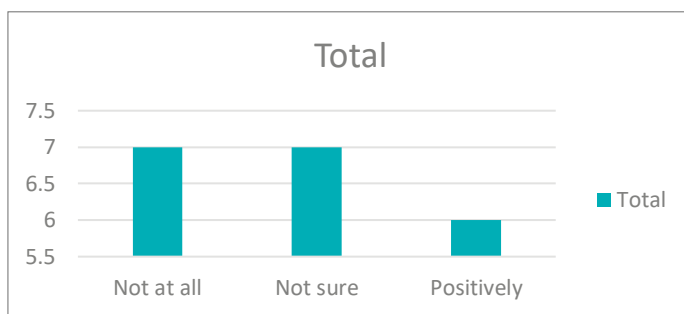
⇒ We are in general agreement with the documented overarching feedback. Our goal is very much to improve upon the current experience of .UK for registrants and registrars, and we do not underestimate the scale of the challenge in making some of these substantial changes.

⇒ We will progress our proposals methodically taking appropriate time for consideration to ensure our target implementation is fit for the future.

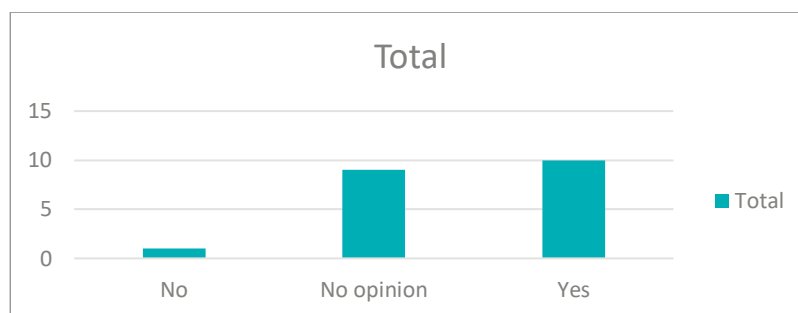
GENERAL EPP RESTRICTIONS – CONFORMING TO RFC5730->RFC5733

The current technical implementation of .UK EPP is non-standard; much of the restrictions placed upon EPP were due to the now defunct random drop times policy where commands were restricted to prevent determination of drop times by unusual means. We proposed to update .UK to follow EPP standards defined by RFC5730 (EPP), RFC5731 (EPP Domain mapping), RFC5732 (EPP Host mapping) and RFC5733 (EPP Contact mapping) for .UK.

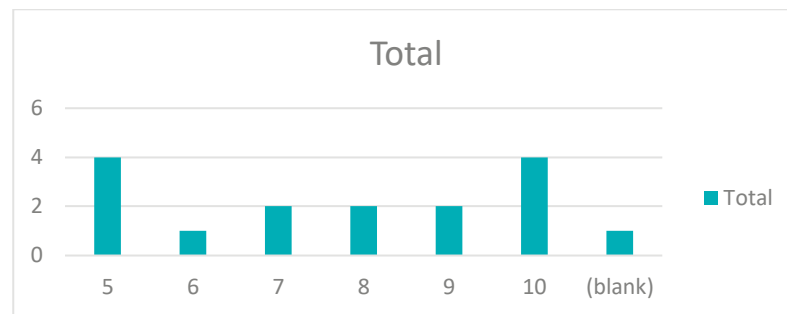
- Many registrars have been supportive of conforming to RFC5730, RFC5731, RFC5732 and RFC5733 standards as it enables the usage of industry standard EPP clients.
- A registrar has queried if this portion of the proposal is a problem that needs solving in .UK given that .UK registrars have worked around it already.
- A registrar raised that even within the compliance with RFC standards there are some different business implementations in play across different Registry Service Providers (RSPs) in redacting different fields such as:
 - Create date
 - Nameservers
 - Locks
- Temperature check results from round table:
 - Beyond any initial update, how would the adhering to RFC5730 to RFC5733 impact on your business?



- Do you think Nominet should adhere to RFC5730 to RFC5733 EPP standards?



- With 0 being against and 10 being supportive of proposals, we had the following split of support on the round table call. “Conform with EPP standards RFC5730 -> RFC5733.”

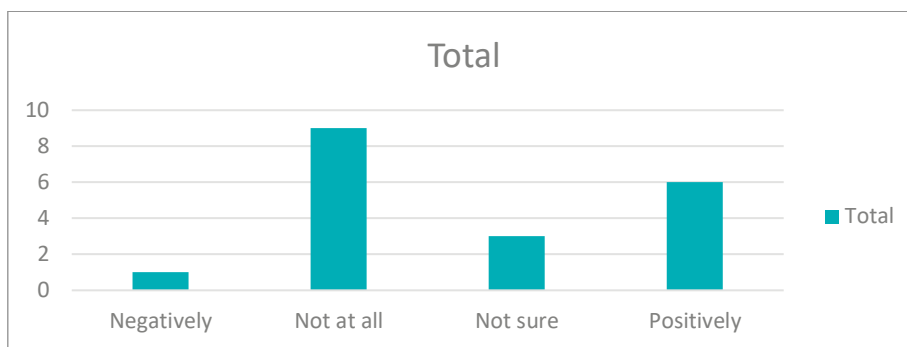


- ⇒ Summary position:
- ⇒ We do not believe we have heard any strong views against this part of our proposals.
- ⇒ We understand that there are some registrars who consider this part of our proposal very important and want to see it progressed because it reduces the need to protocol shift in code (e.g., between EPP and DNS or EPP and RDAP) to determine key data which is already in the public domain.
- ⇒ We have not concluded on a level of prioritisation on any of the parts of our proposal, we are looking to understand the destination before we plan on any delivery route to get there.
- ⇒ We believe this is an area of standardisation because today some aspects of our EPP responses result in 'Authorisation' errors when a conformant EPP server would provide a subset of data.
- ⇒ We have not yet been able to determine any known negative implications for a registrar's system if we were to operate in an EPP compliant mode.
- ⇒ Further details of the proposed operational behaviour have been documented and published.

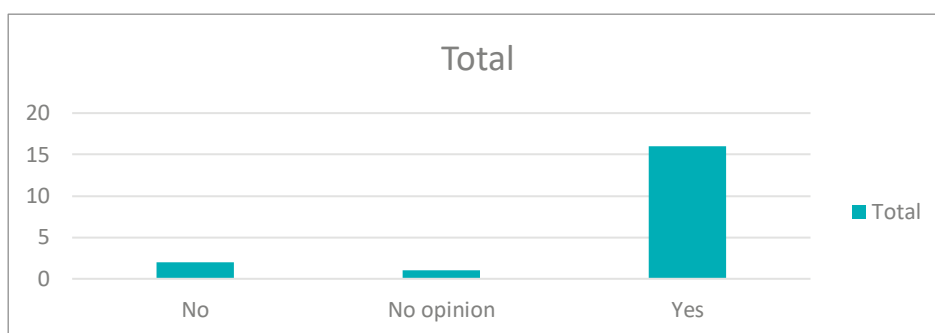
GENERAL EPP RESTRICTIONS - CONTACT MODIFICATION

Historically Nominet have auto-populated the EPP Contact Organisation field with the same contents as that in the EPP Contact name field in order to maintain compatibility with the now defunct 'automaton'. We proposed that Nominet will stop auto-populating the EPP contact 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 as supplied by the registrar.

- A registrar has indicated strong support for Nominet not automatically duplicating name into organisation field for contact objects.
- A registrar has queried if changes to contact modification provide a standardisation benefit or add a burden to change multiple aspects of an implementation.
- Temperature check results from round table:
 - Beyond any initial update, how would the removal of compatibility with the defunct automaton (i.e. the auto-population of the 'Organisation' field of a contact by Nominet's systems) impact on your business?



- Do you think Nominet should remove compatibility with the now defunct automaton auto-population of the Organisation field in .UK and utilise EPP contacts as other registry operators do?



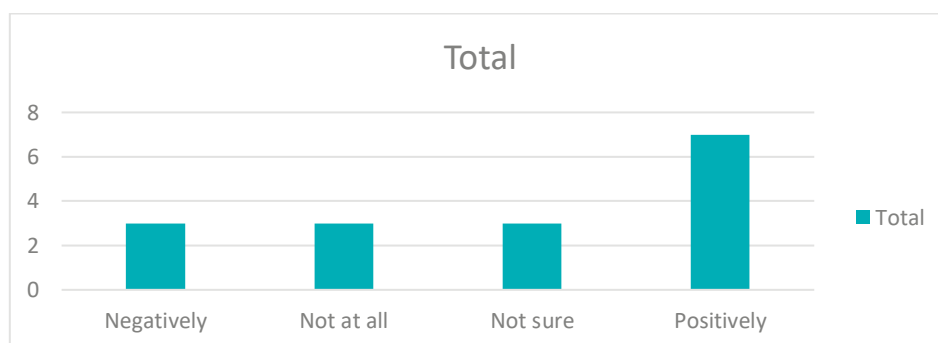
- ⇒ Summary position:
- ⇒ We have heard that at least one registrar thinks we should not make changes to the way we auto-populate the organisation field in EPP; while we have asked why, we have not heard any reasoning as to the why or the impact on the registrar (or registrant) it would have to make a change here.
- ⇒ We have heard wide support for this proposal from a range of registrars of different backgrounds.
- ⇒ We note this current behaviour exists solely as a technical implementation decision for the historic mapping to the now defunct automaton.
- ⇒ We recognise that this part of the standardisation proposal relates to the data that is saved and returned under the protocol rather than the fundamental protocol itself however we believe the current behaviour breaks the principle of least astonishment in implementing the protocol for no good business reason, and that the proposed change would result in better data management practice and therefore should all be considered a part of standardisation.
- ⇒ In the absence of any input as to what the negative registrar impact on removing the auto-duplication of data is; we are minded that in accordance with good data management principles our final standardisation proposal will include that Nominet should cease auto-duplication of the 'Contact name' field to the 'Contact organisation' field.

USE OF DELETE COMMAND

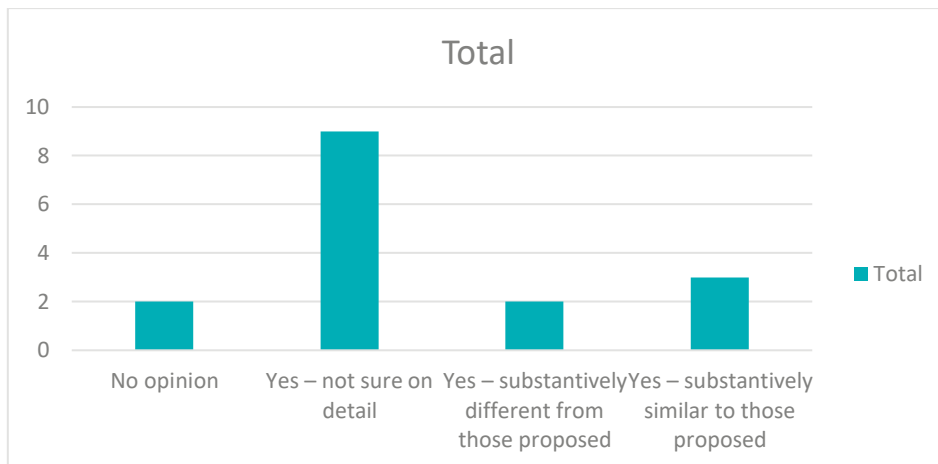
Nominet currently only allow registrars the ability to delete domains prior to their initial invoice; after that point in time the registrar is required to send the registrant to Nominet to cancel the domain. We proposed that Nominet would allow registrars to act as agents of registrants from cradle to grave as it

were – allowing not only the establishment of the contract, the updating of the domain details but also the final cancellation of the contract when it was no longer needed. To provide some protection we proposed the introduction of RFC3915 Redemption Period and a mechanism to restore domains in that period.

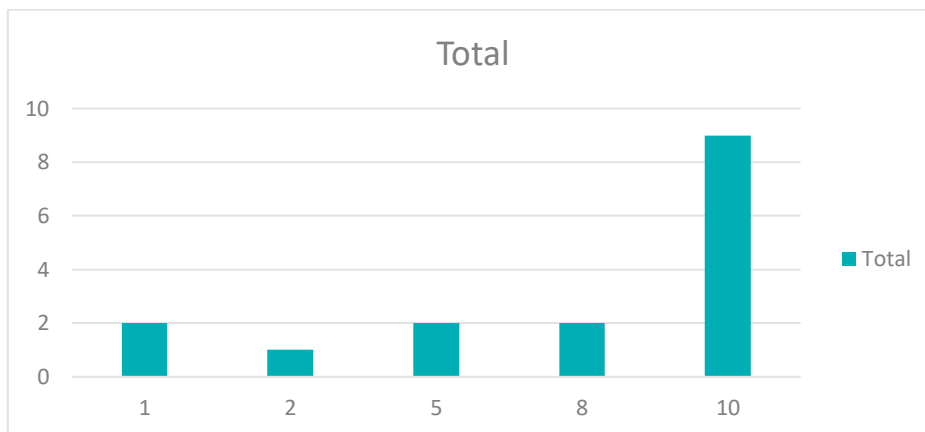
- At least one UKRAC member has at least initial concerns around the processes suggested being suitable for all types of registrar – concern around RFC3915 complexity.
- At least one UKRAC member has some concerns around add grace period deletion limits increasing.
- At least one UKRAC member has concerns that registrars will start charging RESTORE fees.
- Some registrars have welcomed it as being “pretty standard”.
- A registrar has indicated the requirement to make restore as easily accessible as an update will create a significant burden.
- A registrar has queried if Nominet’s intent on not making it harder to restore a domain was to prevent possible charges.
- A registrar has questioned whether allowing redemption fees would be fair on registrants.
- A registrar has indicated they think there are two options in relation to RESTORE:
 - Set a policy saying a registrar cannot charge and make it crystal clear.
 - Set a policy saying a registrar can charge but you must make it clear to the registrant.
- A registrar has indicated that whatever we do with RESTORE we must produce a clear explanation on how this works.
- A registrar thinks we should not allow registrars to DELETE domains and should require them to use DETAG.
- Some registrars have indicated support for grace periods of set lengths rather than the current variable period.
- Some registrars have concern that the RESTORE and RESTORE REPORT methodology may be too complex for some registrars.
- A registrar has indicated that some registrars currently utilise the full 90 days after expiry before renewing to manage cash flow and the need to RESTORE and file a RESTORE REPORT might result in lost domains.
- Temperature check results from round table:
 - Beyond any initial update, how would allowing registrars the ability to DELETE a domain impact your business?



- Do you think that enabling the DELETE command for registrars would require checks and balances in a process?



- With 0 being against and 10 being supportive of proposals, we had the following split of support on the round table call. “Allow registrars to use the DELETE command.”



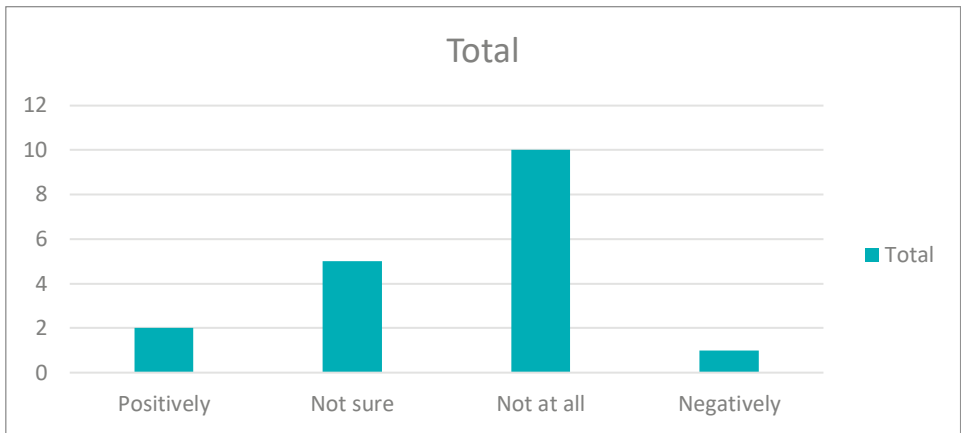
- ⇒ Summary position:
- ⇒ While the concept of allowing the usage of the 'DELETE' command is superficially simple it has some significant implications that differ for different registrar business models and experience.
- ⇒ We recognise that support, acceptance or dissent for this part of our proposals very much depends on the detail of the proposal of how it interacts with other aspects of the EPP standard.
- ⇒ We are publishing a further suggestion to explore options around the usage of DELETE and RESTORE related commands. We are open to further feedback.

AUP REMOVAL FOR INVESTIGATION LOCK

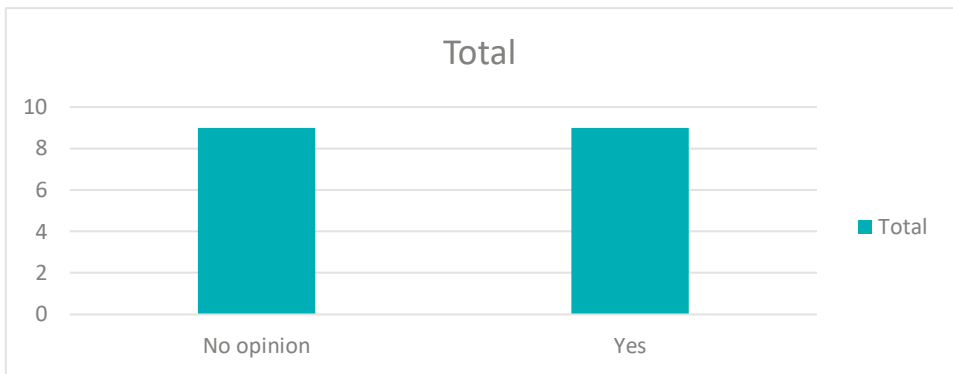
The .UK investigation lock was introduced to allow registrars to deal with potentially abusive domains but usage of it was limited under and Acceptable Use Policy related to the delete command. We proposed to remove registrar limits on the use of 'Investigation Lock' so that it can be applied to all domains which meet the criteria of its usage and domain name abuse can be prevented and investigated without an arbitrary quota.

- No significant feedback has been received in this area.

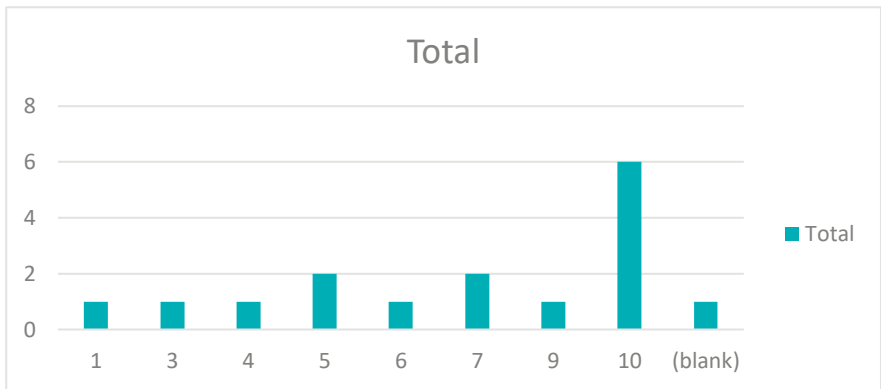
- Temperature check results from round table:
 - How would removing the limitations on investigation lock impact your business?



- Do you think limits on the investigation lock should be removed?



- With 0 being against and 10 being supportive of proposals, we had the following split of support on the round table call. "Remove AUP Limits for Investigation lock."



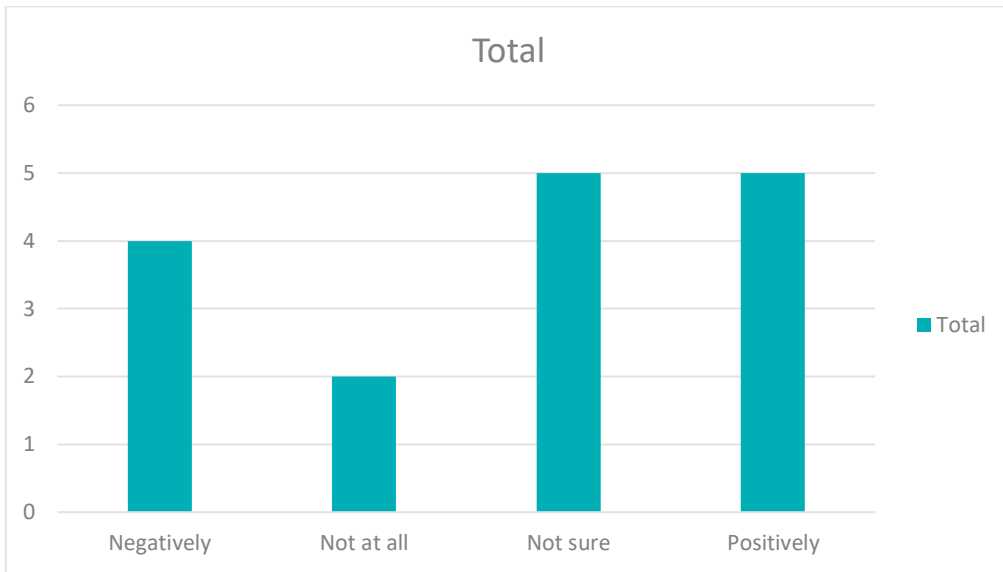
- ⇒ Summary position:
- ⇒ The removal of limits on the use of investigation lock has largely gone without much comment from registrars.
- ⇒ In further reviewing our proposal here we have concluded that we have not yet kicked the tires sufficiently relation to the Investigation Lock. Investigation lock as it stands today pre-dates the 2021 introduction of the standard EPP 'status' fields to .UK that can be utilised for locking objects.

- ⇒ An initial review of investigation lock showed only 55 tags currently utilising the lock for 1 or more domains; and less than 4500 domains being locked using it.
- ⇒ An initial review of this EPP 'client' status which were introduced in 2021 field data shows:
 - 174 tags currently utilising 1 or more 'client' statuses on a domain covering just over 2,730,000 domains;
 - if limited to just 'clientHold' status (which are more similar to the impact of investigation lock) this reduces to 35 tags and just under 22,500 domains.
- ⇒ We believe we should further review whether or not there is a need to retain investigation lock separately from EPP 'client' status as they provide similar net result; and any decisions in this area should be made within full context of all locking mechanisms.
- ⇒ We intend to bring forward some further discussion points in relation to the Investigation Lock and EPP statuses.

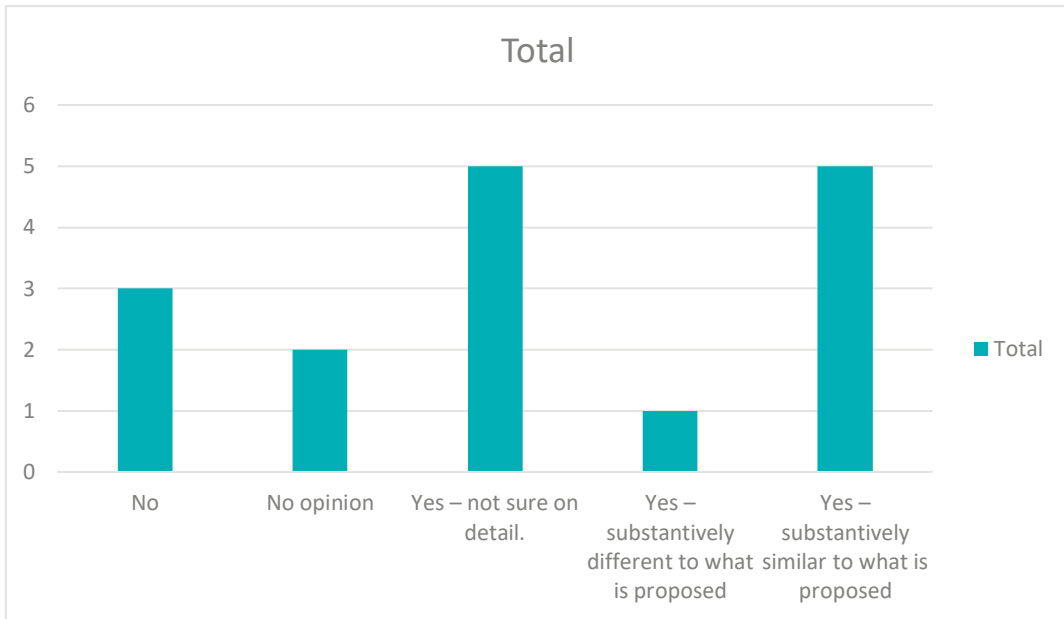
INTER-REGISTRAR TRANSFER PROCESS

We proposed changing to the inter-registrar transfer process from a 'PUSH' process to a 'PULL' process to enable standard EPP clients to function with the .UK registry but also to remove a common security concern within registrar systems.

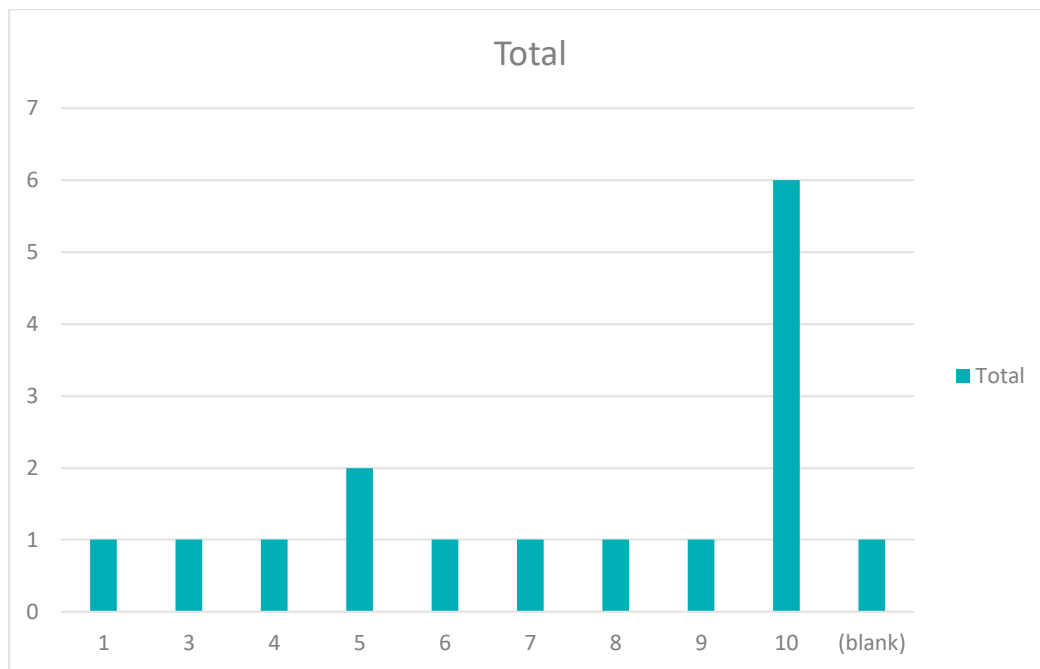
- A UKRAC member is concerned registrars will force renewal charges for registrants on transfer in.
- Some registrars have indicated they want a minimum of 1 year renewal mandated at the registry.
- Some registrars are generally supportive.
- Some registrars think we should align with revised gTLD process when complete.
- Some registrars think technical alignment with a different policy overlay from gTLDs.
- Some registrars think we should remain with the existing process.
- A UKRAC member wants the inclusion of a Bulk Transfer After Partial Portfolio Acquisition process.
- A registrar indicated that this is Nominet's opportunity to lead the industry and improve on what is already out there.
- A registrar queried whether we would impose a 60-day lock on transfer in.
- A registrar queried if change of registrant could happen at the same time as a transfer of registrar?
- A registrar considers the PUSH transfer system to be one of the best parts of the .UK system.
- Some registrars indicated that the biggest benefit of the current .UK transfer system is that it is fast, reliable very easy to explain and there is no faffing about.
- A registrar indicated even .UK push transfers are not a standard as different registrars have handshakes turned on.
- A registrar queried if there would be a plan to charge for "emergency" auth codes.
- A registrar queried who will generate auth codes; and whether they will expire.
- Temperature check results from round table:
 - Beyond the initial update, how would amending the transfer process of .UK in this way impact your business?



- o Do you think we should amend the inter-registrar transfer process of .UK?



- o With 0 being against and 10 being supportive of proposals, we had the following split of support on the round table call. “Change inter-registrar transfer process.”



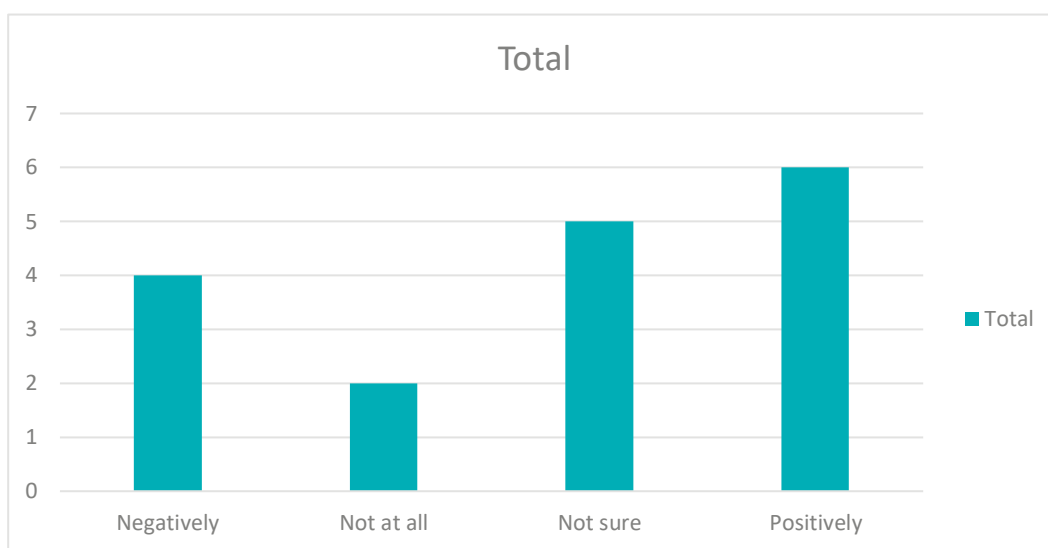
- ⇒ Summary position:
- ⇒ We believe there are 2 key underlying areas that need to be addressed that are impacting coherence within the marketplace:
 - The contractual status between the new registrar and the registrant can be questionable in the scenario of our current transfer process – have they contracted to act as agent to the registrant or not?
 - An underlying security concern around who can seize control of a domain that is not yet allocated to an account in the new registrar’s system.
- ⇒ The most common blocker complained about when being unable to use third party EPP clients is Nominet’s unique transfer process.
- ⇒ Whilst not universal; we have heard general support for a change of inter-registrar transfer from a technical perspective, but there is concern on how some of the business processes will interact.
- ⇒ We are minded to consider how we can retain the speed of transfer whilst following industry aligned processes.
- ⇒ We are proposing a revised process based on the feedback received to date and would like to hear further views on that process.

.UK LIFECYCLE

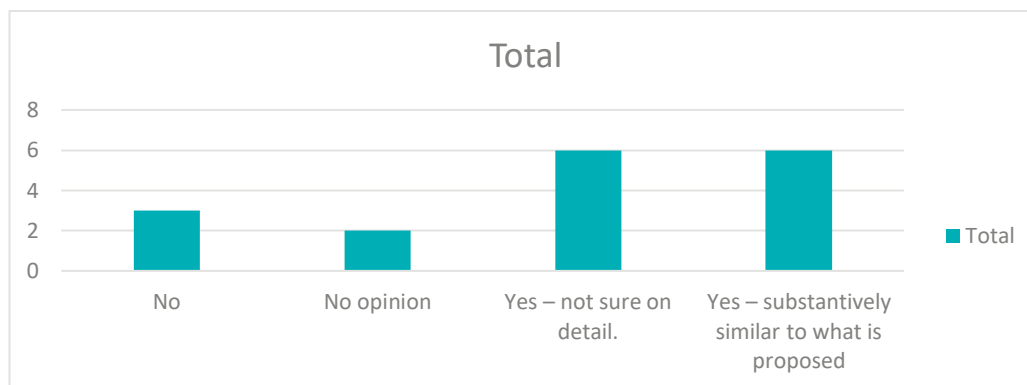
We proposed moving .UK from an auto-delete lifecycle to an industry standard auto-renew lifecycle utilising the standard EPP protocol.

- A UKRAC member advised our wording around disrupting DNS in the auto-renew period is misleading. Our intent was that registrars themselves could choose to either interrupt DNS or not during the auto-renew period as their contract with the registrant states not that we mandating a post-expiry approach to interruption.

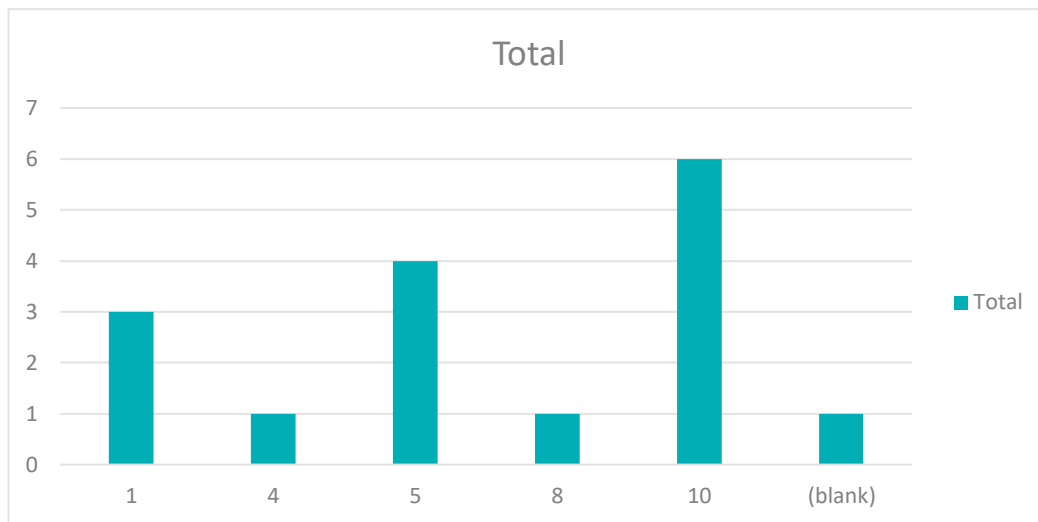
- A UKRAC member indicated the proposed lifecycle may be a significant problem for some and may have challenges with a scenario where they have to choose to DELETE a domain rather than choose to RENEW a domain.
- Some registrars are very supportive of the standardisation of lifecycle.
- Some registrars who are not directly involved with gTLDs are understandably apprehensive and unsure what the reality of the new lifecycle would mean for them given the current level of detail.
- A registrar was interested in keeping the existing options to auto-renew ahead of expiry or mark as no longer required per domain.
- Some registrars have indicated that the invoicing method for auto-renew used in .cymru/.wales should not be used.
- A registrar queried if the registrar had to wait the full 45 days of auto-renew period before triggering a delete or was able to delete according to their agreement with a registrant.
- A registrar queried if the option for a registrant to renew directly with the registry would remain in place.
- Temperature check results from round table:
 - Beyond the initial update, how would amending the lifecycle of .UK in this way impact your business?



- Do you think we should amend the lifecycle of .UK?



- With 0 being against and 10 being supportive of proposals, we had the following split of support on the round table call. “Update .UK lifecycle to match gTLDs.”

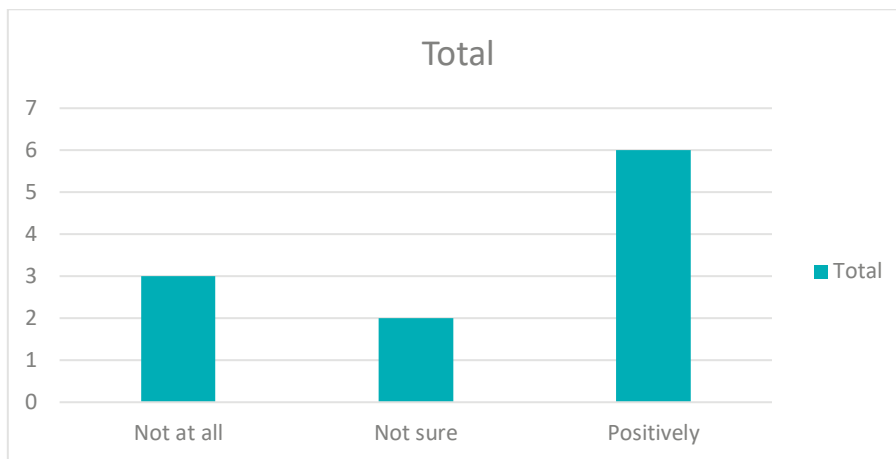


- ⇒ Summary position:
- ⇒ This is perhaps one of the most complex areas of our proposals in how it interacts across a variety of areas of the system.
- ⇒ We have provided some revised detail and are looking for further registrar feedback.

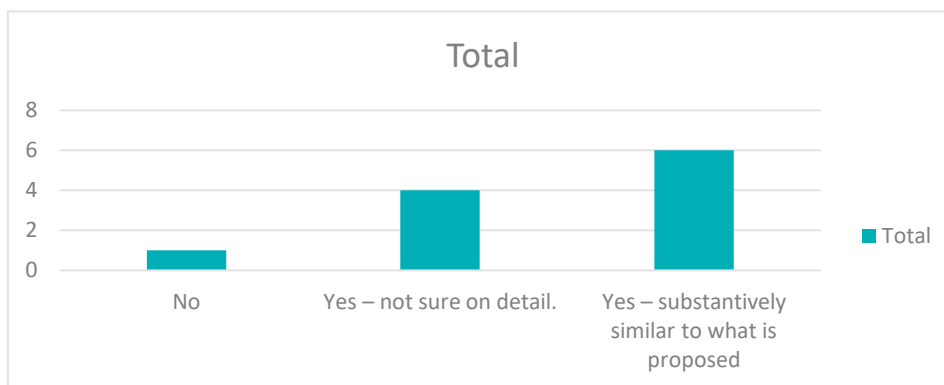
TAG TYPES

In .UK there are currently 3 different types of TAG allocated to registrars. We proposed moving to a uniform tag type with differences based on use case rather than chosen tag type.

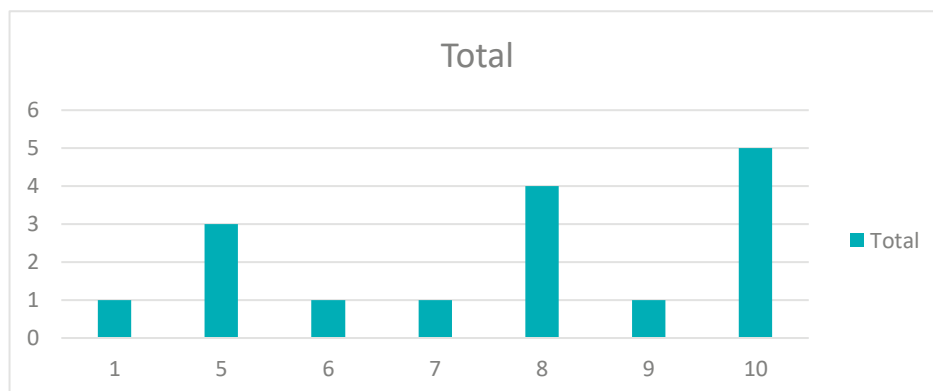
- Some UKRAC members and registrars were concerned that a unified tag type would mean everyone has to comply at a higher level of customer service.
- A UKRAC member wishes to keep differentiated access as a reward for higher standards.
- Some registrars have welcomed the ability to provide full service for their customers.
- Some registrars think one legal entity should be limited to a single TAG.
- A registrar queried if it was time for the concept of multiple tags to be discontinued and only have one tag per legal entity.
- A registrar queried If the requirement around business insurance would remain.
- Temperature check results from round table:
 - How would amending the Registry Registrar Agreement to have a single TAG type impact your business?



- Do you think Nominet should implement one level of accreditation?



- With 0 being against and 10 being supportive of proposals, we had the following split of support on the round table call. “Unify Tag types.”



- ⇒ Summary position:
- ⇒ While not universal, there appears to be general support for simplification of the .UK tag types but people do think the devil will be in the detail.
- ⇒ We are minded to further develop the proposal with a skeleton form of how things could be made to suit different business models under a unified single type of accreditation that scales appropriately to customer and business model needs.

⇒ We expect to add details in relation to behaviour for non-member tags as well.

TERMINOLOGY

- A registrar commented that if we move to an auth-code based system the concept of TAGs is no longer needed externally to registrants.

⇒ Summary position:

⇒ We would generally agree with that comment made; the details around terminology will be finalised when we have greater clarity on all areas of these proposals.