

The Nominet .uk proposal

Understanding the consequences of a new .uk TLD

The aim of this paper is to inform UK businesses, not-for-profit organisations and the media about what is happening in the .UK namespace and how it could affect their internet presence. We believe that the .UK proposals as they stand could create significant confusion, unfairness and expensive rebranding costs to businesses.

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Introduction to direct.uk

Nominet the .uk domain name registry is a not-for-profit public purpose company who have managed a number of second level domains (SLDs) since 1996 - these are:

Nominet .uk Registry	
Second level domains managed by Nominet [1]	Second level domains delegated to other organisations [2]
.co.uk (Commercial)	.ac.uk (Universities)
.org.uk (Not-for-profit)	.gov.uk (Government)
.me.uk (Personal)	.mod.uk and .mil.uk (Military)
.ltd.uk (Limited companies)	.nhs.uk (NHS)
.plc.uk (Public limited companies)	.police.uk (Police)
.net.uk (ISPs)	.judiciary.uk (Courts)
.sch.uk (Schools)	.parliament.uk (Parliament)

Sources: [1] Nominet.org.uk: Second level domains

[2] Wikipedia: .uk Second level domains

At present each important organisation & stakeholder in the UK digital economy has its own namespace and second level domain which can be recognised and trusted by the general public. However today (August 2013) Nominet is now proposing that the .uk namespace be opened at the top level (directly under .uk). This could mean soon businesses and individuals will be able to register anything.uk instead of being restricted to second level domain names which will co-exist alongside **direct.uk**.

The first Nominet .uk consultation (October 2012)

On 1st October 2012 Nominet first consulted on a proposal to open up the namespace directly under .uk – the proposal was called “direct.uk”.

Key aspects of this proposal included a number of **security** features:

- Enhanced security capabilities, including routine monitoring and notification to registrants of viruses and malware, as well as a digital signature known as DNSSEC which minimises the risks of a domain name being hijacked. Under the proposals, domain names affected by malware would be suspended if registrants fail to take action to rectify those issues.
- A verified UK presence requirement for registrants in order to be eligible for the new domains.
- A staged release process for the domains, with registered rights holders’ applications considered in the first phase, then unregistered rights holders. All those using existing .co.uk, .org.uk etc domain names would be granted unregistered rights under the proposed plans.
- The new domains would potentially be sold via registrars that can meet the required data quality and service levels.
- A wholesale price point of around £20 per year (currently .uk is £5 for two years)

Source: [Nominet consults on one of the most significant developments for the UK internet](#) 01/10/12 [3]

However the proposal was met with an outcry from the stakeholders in particular the registrar community. Read the consultation summary here:

[Direct.uk Consultation Summary of Feedback](#) by Nominet 26/02/13 [4]

[Nominet direct.uk Consultation Response Analysis](#) by Nomensa 25/02/13 [5]

Therefore on 26th February 2013 the Nominet board decided “There was not a consensus of support for the direct.uk proposals as presented” and that “a revised phased release mechanism based largely on the prior registrations of domains in existing third levels within .uk” would be produced by June 2013 . See [6]: [Nominet February Communique 2013](#)

The second Nominet .uk consultation

On the 1st July 2013 Nominet then released its second .uk consultation.

Key features of this proposal now are (with far less focus on security):

- Enhanced checks on data supplied for all registrations. The process would ensure that the named individual resides, or the named business trades, at the specified address.
- For registrants not based in the UK, a UK 'address for service' would be required. This would also be displayed in the WHOIS.
- A 'right of first refusal' would give registrants of existing .uk domain names at the third level (e.g. .co.uk, .me.uk, .org.uk etc) the opportunity to secure the corresponding registration at the second level. In the event of two competing claims, the oldest current, continuous registration would be given priority. The proposal is to run the right of first refusal for a 6 month period from launch.
- Domains not covered by a right of first refusal would be available to register from launch on a first-come, first-served, basis.
- A competitive price point, with a proposed wholesale fee of £5.50 for one year or £4.50 per year for multi-year registrations.
- Many bodies currently using .gov.uk domains will no longer be able to do so under the Government Digital Transformation Programme, which will consolidate the domains under gov.uk. Nominet propose to reserve the affected domains.
- A commitment to offer services to improve security across the whole .uk namespace.

Source: [Nominet proposes new policy for second level domain registration](#) 01/07/13 [7]

The most important aspect of this proposal is “the oldest current continuous registration would be given priority” across .co.uk .org.uk .me.uk. Therefore many brands may lose out to competitors in other SLDs:

Domain	.co.uk reg date	.org.uk reg date	.me.uk reg date	Winner of .uk
Windows.co.uk	19-May-2005	09-May-2004	14-Jan-2002	Windows.me.uk

Consequences of the Nominet .uk proposals

We believe if .uk is introduced in the way Nominet propose, there are unforeseen and damaging consequences that are likely to happen:

- Millions of .co.uk owners with online .co.uk businesses will find that their matching domain name in .uk will be owned by somebody else. These companies may also face competition from these registrants and or be extorted by cyber squatters & cyber criminals. Also even if the new .uk domain is not used by the new registrant it could cause problems over time for the .co.uk business (customer confusion).
- Based on the current number of 9,500,000 .co.uk domains registered, Nominet have only so far contacted directly an estimated number of less than 10,000 registrants. Therefore the vast majority of .uk registrants do not know about direct.uk and will only have 6 months to make a claim to their corresponding .uk domain name.
- Up to 250,000 businesses may find they don't have the right to their equivalent .uk domain, due to the way Nominet intend to allocate rights to the domain, namely .org.uk, .net.uk and .me.uk owners. This is based on Nominet figures in the .uk proposal notes justifying their action with 500,000 identical third level strings.
- 10,000's of businesses per year, after .uk is introduced, who obtained the .uk for protection, will forget to renew the .co.uk or .uk domain as it is not used and it will then fall into the hands of somebody else, with the same consequences as outlined in point number 1.
- Organizations that move over to .uk will incur huge rebranding costs which will cost the economy billions of £'s for little or no benefit.
- Confusion will reign over what the different UK domain extensions mean compared to the order we have at present with .co.uk (commercial), .org.uk (not for profit), .me.uk (personal), .gov.uk (UK government), .ac.uk (education), .sch.uk (schools), .ltd.uk (limited

companies), .plc.uk (plc company), .police.uk (police), .nhs.uk (NHS)
what will .uk actually mean?

- Moving domain names even from .co.uk to .uk can be very disruptive to search engine rankings, which many businesses will not understand and find out to their cost, the damage that can be done to traffic, search engine rankings and lost links.
- Confidence in UK domains may be lost by the consumer in the way Nominet has handled the introduction, which may affect existing registrants in all sorts of ways. With the introduction of several hundred new domain extensions such as .london, .shop etc. any loss of confidence could not happen at a worse time.
- Confidence over time may be lost in businesses that maintain .co.uk and don't move over to .uk and so suffer commercially in the long term if they did not obtain the equivalent .uk.
- It is harder to find a new domain .uk if everybody wants the .uk whereas before certain organizations used different extensions such as .org.uk.
- There will also be a wave of cybercrime based on the domain name, which has already started to happen in registrations have been made for capturing type in and email mistakes e.g. argosco.uk would capture traffic incorrectly for argos.co.uk, such mistakes would happen. Certain people have started to register <yourbusiness>co.co.uk to be entitled to the equivalent <yourbusiness>co.uk when they launched in 2014.

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Proposed Solution

We believe there are two sensible options available to Nominet:

Solution 1

Do not open .uk at the top level and create more second level domains to provide more capacity and choice for registrants. Nominet could create:

.bank.uk .shop.uk .blog.uk .london.uk .scot.uk .yorkshire.uk etc

Nominet already has a [UK SLD policy](#) [8]

It could be that the [SLD fees](#) [9] need to be reduced in order to allow more UK SLDs to be registered.

Solution 2

Open .uk however give all .co.uk registrants first priority on .uk (free first refusal for two years). This is because most of .uk registrants are based in .co.uk & the other SLDs are restricted / intended for non-commercial use:

Monthly Registration Statistics for .uk Domain Names (Jan 2012 – Mar 2013)

Month / Year	co.uk	ltd.uk	me.uk	net.uk	org.uk	plc.uk	sch.uk
Jan 2012	179,905	76	1,772	3	8,615	1	40
Feb 2012	177,239	57	1,692	1	8,644	1	33
Mar 2012	167,736	77	1,580	3	9,778	1	20
Apr 2012	154,753	73	1,576	2	9,030	1	9
May 2012	163,956	53	1,556	0	9,477	0	18
Jun 2012	151,279	55	1,526	2	8,013	2	24
Jul 2012	151,955	75	1,327	2	7,834	0	35
Aug 2012	138,991	84	1,368	5	7,162	0	23
Sep 2012	147,760	48	1,339	0	8,016	0	26
Oct 2012	159,407	77	1,369	0	8,463	1	31
Nov 2012	155,094	59	1,200	3	7,632	2	16
Dec 2012	113,516	49	1,079	1	5,884	1	22
Jan 2013	177,162	74	1,343	3	8,419	0	13

Source: [Nominet the domain business report April 2013](#) [10]

In New Zealand for example DNCL is proposing that existing .co.nz registrants be able to reserve registration of the equivalent of their current name at the .nz second level (for no cost for at least two years).

See [11]: [DNCL Second Level Consultation and Submissions \(Round 2\)](#)

Your Response

We urge you to reply to the Nominet consultation by 23 September 2013 outlining your concerns. You can [reply to the consultation here](#). [12]

Consultation responses will be summarised by Nominet in November 2013.

References

[1] Nominet.org.uk: Second level domains
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https://en.wikipedia.org/wiki/.uk#Second-level_domains

[3] Nominet consults on one of the most significant developments for the UK internet 01/10/12
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[4] Direct.uk Consultation Summary of Feedback by Nominet 26/02/13
http://www.nominet.org.uk/sites/default/files/SummaryofdirectukFeedback_1.pdf

[5] Nominet direct.uk Consultation Response Analysis by Nomensa 25/02/13
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[6] Nominet February Communique 2013
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[7] Nominet proposes new policy for second level domain registration 01/07/13
<http://www.nominet.org.uk/news/press-releases/nominet-proposes-new-policy-second-level-domain-registrations>

[8] UK SLD Policy
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[9] SLD fees
<http://www.ukslid.org.uk/page/scheduleoffees.html>

[10] Nominet the domain business report April 2013
<http://db.nominet.org.uk/page/the-uk-in-detail/>

[11] DNCL Second Level Consultation and Submissions (Round 2)
http://dnc.org.nz/second_level_proposal_c2

[12] Nominet second .uk consultation
<http://www.nominet.org.uk/how-participate/policy-development/current-policy-discussions-and-consultations/registration-second>