
ICONZ

DOMAIN REGISTRATION AND HOSTING GROUP

25 August 2006

SUBMISSION

To the office of the

New Zealand Domain Name Commissioner

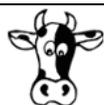
Upon the review of the policy governing

Registration, Management and Cancelling Domain Names (RMC 1.4)

This Submission is made jointly on behalf of the following Authorised Registrars

- 1) WebFarm Limited
- 2) Freeparking, a division of WebFarm Limited
- 3) 2Day Internet
- 4) ICONZ Limited.

Author: Richard Grevers



WebFarm

Freeparking



Introduction:

By and large we agree that the existing policy RMC 1.4 issued 5 September 2003 is fair and operable and well suited to the New Zealand internet community.

However, we wish to submit the following proposals for change to the policy:

Clauses 7.6 and 11.5

Both these clauses require the registrar to send the UDAI to the registrant immediately upon registration or any action that changes the UDAI.

We propose the following changes:

7.6 *The registrar will pass the details of the registration onto the registrant, including an explanation of the purpose of the UDAI and instructions on how to obtain it. If the registrar's UDAI retrieval process is not fully automated, the registrar will send the UDAI to the registrant at the conclusion of the grace period.*

11.5 *Registrars are required to either:*
provide a system where the registrant may obtain the current UDAI at any time without the manual intervention of the registrar (including automated retrieval or reset of any account password)
OR
pass on the UDAI to registrants whenever a new UDAI is generated.

Rationale:

1. We believe that sending the registrant the UDAI unsolicited places upon the registrant an unnecessary burden of storing the UDAI securely until such time as they require it or until it is superseded. Thus each time a registrant receives a new UDAI they would need to transfer the data to some safe form of storage and delete it from their email (since most email clients do not offer secure storage of data). We believe that there have been cases in which an unauthorised person has accessed a UDAI in possession of a registrant and used it to gain control of the Domain Name.
2. We find that in some 10 - 15% of cases where a registrant bypasses our published information on how to obtain their UDAI and contacts our support team seeking a UDAI, the registrant says that they have been asked by some third party (usually a web developer, ISP or host, in some cases directly connected to another registrar) to supply a UDAI in order to perform some unrelated function such as change DNS. When the likely consequence of passing on the UDAI is explained, the registrant often says they have no desire or intention to change registrar. Retrieval on demand reduces the instance of unwanted transfers.
3. At the time of registration we have not yet verified whether the address supplied as registrant contact is either active or accurate, or that it goes solely to the registrant. For this reason we do not email account passwords, and we would place UDAIs in the same risk category.
4. It increases the support burden for registrars as registrants try to use UDAIs which have been superseded.
5. We believe that so long as the registrant has 24/7 automated access to the UDAI (even for an expired domain) there are no barriers to a registrant wishing to transfer. Automated access infers that the registrant should in most cases be able to reset a forgotten password without manual intervention by the registrar. (The exception to this being where the registrant has failed to notify the registrar of changes to their email address, and documentation of their identity is required to authenticate a change of email address).

6. That it is a poor business model for registrars to have to say “Welcome aboard, here’s the key to leave us” rather than: “Welcome aboard, here are your rights”.
7. We recognise that not all registrars are able to provide fully automated UDAI retrieval, and in that case the requirement to proactively provide UDAs to registrants should remain.

Clause 11.7

This clause appears to be no longer necessary and should be deleted.

END OF SUBMISSION