Draft Response to Nominet .Cymru / .Wales Consultation
14th January 2013

Two Registries

1. We prefer Option 1 (domains are directly linked)
2. Yes, if Option 2 (registrant has first refusal on registration in other domain) is chosen then Nominet should consider incentives to register both.
3. Janet notes that Nominet might choose to look beyond merely seeking registrations in both .cymru and .wales to positively encouraging registrations in both Welsh and English. As stated below, this would require a site to register four domains.

4. Option 2 would give the registrant of pen.cymru first refusal of pen.wales. If they choose not to register pen.wales then that domain will acquire a different status because a subsequent registrant cannot be offered pen.cymru as they normally would. This needs to be made clear to registrants if Option 2 is taken forward.
5. A brief 'closed period' (where the original registrant of pen.cymru has the exclusive option of registering pen.wales) would enable registrants of a domain in one registry to fully consider the implications of not registering the alternative domain (and resellers to explain the benefits).
6. All of the three options would require an organization or individual to register more than one domain if they wish to distinguish themselves with a bilingual domain name. Under the options, an organization might have to register: example.wales, example.cymru, esiampl.cymru and esiampl.wales in either two (Option 1) or four (Options 2 & 3) separate actions.

    If Nominet and the Welsh Government wish to positively encourage the uptake of bilingual domains (rather than merely monolingual domains ending in .cymru and .wales) they might choose emphasise the registration of four domains at the initial registration. Option 1 facilitates this by requiring only two registration 'actions' by the registrant. In effect, this means operating .wales and .cymru as a single domain.

Eligibility by location

7. Yes.
8. We agree with the consultation document that it would be impractical to restrict the scope of registrations. The only alternative approach would be to allow 'notice and take-

down' of inappropriate domains after registration, but this in itself would create an unmanageable administrative overhead and potential for malicious complaints.

9. The eligibility criteria are different from those in the application to ICANN and now match the current policy for .co.uk . However, we note that Nominet's current direct.uk consultation suggests that requiring a physical presence in the UK would result in those domains being more valuable. In light of this, we view Nominet's decision as a reflection of .cymru/.wales as a 'cultural' domain rather than purely geographical.

No SLDs

10. Yes
11. Yes
12. We are pleased to see recognition of the need to protect the 'natural' names of public authorities.

    We also note and welcome Nominet's intention to reserve and consider on a case-by-case basis equivalent public sector second level hierarchies (such as .ac. and .sch.) to those within the .uk domain. We suggest that existing SLDs should normally be delegated in line with existing .uk guidelines, modified as appropriate for the devolution of parts of the public sector. Janet has undertaken a general discussion with the academic sector in Wales and, whilst there is no indication that sites will move away from their existing primary .ac.uk domains, we have noted some interest in Janet sites in Wales registering additional domains within the ac.cymru and ac.wales domains. We will continue to consult with the Janet community on this point, alongside the relevant Welsh funding bodies, and would welcome an opportunity to discuss fulfilling any future need with Nominet.

    We also strongly support the ban on creating third level sub-domains for sale as this should prevent the confusing appearance of privately held competing or deliberately misleading hierarchies such as *.cyngor.cymru or *.prifysgol.cymru.

WHOIS
13. [Left Blank]
14. [Left Blank]
15. [Left Blank]

Security
16. [Left Blank]
17. [Left Blank]
18. [Left Blank]
19. [Left Blank]
20. We note that Nominet is currently discussing its policy and practice for dealing with malicious and criminal activity in the .uk domains. The approach in .cymru and .wales should be informed by the outcome of that discussion.

Bilingual Domains
21. Yes
22. We feel that the approach is sensible, and takes account of the requirements of the Welsh alphabet. However we note that clarity on the ability to make use of $\hat{y}$ and $\hat{w}$ (which are in

the Unicode Latin Extended-A block so cannot be represented by a single byte) would be useful to registrants.

Language Policies
23. Yes
24. [Left Blank]
25. In some ways, having both .cymru and .wales provides a key opportunity for increasing the practicality of bilingual content related to Wales. However, the reality of the modern web means that end users will often end up navigating between languages before reaching the content they are seeking. Instead of mandating particular behaviour, we hope that the Welsh Government (perhaps via the Welsh Language Commissioner) will provide updated best practice on effectively operating bilingual domains following .wales/.cymru (for example, whether to forward the domain example.cymru to the English or Welsh version of their website, and vice versa with esiampl.wales).

Launching the Domains – reserved list
26. Yes
27. [Left Blank]
28. As noted in our response to Q12, we are pleased that existing .uk second level domains will be on the reserved lists (including .ac and .sch) and that relevant groups will be able to enter in to discussions to enable to appropriate use of these domains. To avoid confusion we suggest that existing generic top-level domains should also be reserved. We would also note that, in line with the new domains' bilingual approach, equivalent Welsh second level domains might need to also be added to the reserved list. We would suggest that these be discussed with affected .uk second level domain authorities.

The intended approach refers to "any Welsh or UK-wide statutory body" being able to request to have their name on the reserved list. We note that some organisations may also wish to register translations, legacy or trading names, and that given the current merger activities within the academic sector in Wales this may particularly affect the Janet community.

We also suggest that to protect against misrepresentation of public sector organisations, generic titles used for such bodies - e.g. cyngor/council, ysbyty/hospital, llyfrgell/library, ysgol/school, coleg/college and prifysgol/university - should also be considered for the reserved list.

Launching the Domains – Founders Programme

29. [Left Blank]
30. [Left Blank]

Launching the Domains – Phased Approach

31. [Left Blank]
32. [Left Blank]
33. [Left Blank]

34. We note that the ICANN ballot for domain prioritisation will result in significantly different timescales for .cymru and .wales and would appreciate clarity on how Nominet's timetable will accommodate this (for example, by waiting for .wales to be approved).

We also note that that, unlike the direct.uk proposal, it is not clear whether holders of existing .uk domains will be eligible for the Unregistered Rights Sunrise phase. Whilst this does not directly affect Janet, we feel that this may impact existing Welsh organisations (or organisations operating in Wales) who might wish to take advantage of the new domains.

Launching the Domains – Mediation

35. Yes
36. [Left Blank]
37. We note that new domains are contractually bound to implement ICANN's UDRP, even though this is generally regarded as less fair to domain holders than Nominet's DRS for .co.uk etc. We therefore welcome the offer of a mediation service as restoring one of the desirable features of the DRS.

Any other Comments

38. [Left Blank]