

IEDR Consultation process – pre PDP

Over the period since November 2002 the IEDR consulted with the Local Internet Community on a number of important policy related issues and other matters of procedure, process and practices. These consultations were informal in nature, but were nevertheless structured to obtain the views of stakeholders on matters that impacted them, in their roles within the Local internet community. Over the years the IEDR consultation process improved - from the early use of Word documents sent by post or email, to the use of a Registrar Forum, polling software, and later, dedicated mailing lists.

In late 2010, the IEDR launched a process to develop a formal Policy Development Process (PDP). Following a detailed [consultation process](#), the dedicated working group reached consensus on a new PDP, which went ‘live’ on 31 May 2011.

A representative sample of the early informal consultations is set out below, in no particular order of importance:-

1. API introduction.....	1
2. Registry Registrar Model (RRM) consultation.....	2
3. Revised T&C’s for new resellers (and termination of the VRS).....	2
4. Personal Domain Names.....	4
5. Transfer policy v2.....	4
6. Whois service enhancements.....	5
7. Documentation requirements :- relaxations and clarifications.....	5
8. Poll on reducing the Volume of automated emails from IEDR.....	6
9. Poll on IE Zone reload frequency.....	6
10. Reduction to 27 days for an Application Ticket.....	6
11. Conditional Acceptances Policy Amendment.....	7
12. Proposal to publish Registrar names for new registrations stats.....	8
13. Poll on the choice of a new Accredited Registrar logo.....	8

Note that the term “resellers” used below refers to IEDR’s accredited Registrars. The terminology was changed in 2010.

1. API introduction

Change :- proposal to offer resellers an automated interfaces with the registry, facilitating automatic domain name registration, modification, deletion and payment.

Reason :- a natural progression in the levels of automation that IEDR provides to its reseller base.

Points of note:- the consultation process on the features of the system benefited from the formation of an API working group. The IEDR provided a test infrastructure, system and architecture documentation and assistance by e-mail / phone / Skype. Enhancements were suggested and accepted prior to and subsequent to the launch date

Result :- resellers are using an effective, efficient API which has dramatically increased their productivity, and has most likely decreased their processing costs.

2. Registry Registrar Model (RRM) consultation

Change :- offering APD (automated provisioning of domains) and formalisation of the relationship into a Registry-Registrar Agreement is proposed to make the roles, responsibilities, commitments and obligations of both parties abundantly clear (without adversely impacting the existing Managed Registry Model).

Reason :- IEDR's objective is to introduce the maximum level of automation and minimize the level of manual intervention in the registration, renewal, non-renewal (MSD) and payment processes, in a way that minimises the time to activation of new registrations and renewals and reduces the total costs in the supply chain whilst eliminating duplication of effort and manual re-keying.

Points of note:- In summary, the IEDR proposal is:-

- An Accreditation Process for current IEDR resellers to become Registrars. (See Appendix 1 for draft requirements)
- New registrations from Accredited Registrars could go direct to the IEDR database, via the upgraded IEAPI. There would be a need for an Audit Process ex post facto by IEDR's Registration Services team. (Domains failing the audit will be deleted).
- Account Drawdown Facility – Immediate payment for new registrations and for domains tagged as “Auto-Renew” by Registrars (replacing the current “pay offline” option).
- Hourly updates to the IE zone file
- Accredited Registrar's agreement on the minimum error rates (Accuracy Thresholds).. The consequences of dropping below 99% Accuracy Thresholds (TBD) will include suspension of APD entitlements, and / or suspension of accreditation status.
- Price reduction from the reseller rate – currently €xx. The percentage reduction (TBD) would recognise the requirements for system and process improvement by Registrars, in particular on minimising their error rates, taking on risks arising from retrospective audit tests by IEDR and to a lesser extent, in recognition of earlier payment.
- The current single invoice at month end will be replaced by invoices which will be issued at regular intervals through the month, corresponding to fees on the account drawdown.

Result :- The proposals lapsed for a number of reasons, primarily due to resistance to the consequences of the ex post audit, difficulties regarding the operation of Accuracy Thresholds and the consequences of falling below minimum error rates.

3. Revised T&C's for new resellers (and termination of the VRS)

Change :- The proposal was to revise the Terms and Conditions (T&C's) for new resellers with effect from 1 January 2006. Extracts from the text of the consultation document are set out below. Simultaneously the volume rebate scheme (VRS) was to be terminated, and prices were to be reduced immediately by 25.6%.

Reason :- The focus on better accreditation recognises that the Local Internet Community (LIC) is entitled to high levels of service, access to competitive pricing, high standards, and courses of redress in the event of reseller failure – either financial or technical.

Result :- following an extensive set of consultations by phone, e-mail and face-to-face meetings the proposals were accepted by the reseller group. One notable exception was xxxxxx (*name of reseller withheld*) which sought to raise the limit to 500 domains for new applicants, and to apply the 500 domain threshold retrospectively to the existing reseller base (thereby removing 103 accredited resellers from the competitive landscape).

“We propose to revise the Terms and Conditions (T&C’s) for new resellers with effect from 1st January 2006. Volume requirements will be increased to 200 domains, and minimum standards regarding technical and domain registration experience will be increased. (See Appendix A).”

“Appendix A

Revised Terms and Conditions for New resellers.

With effect from 1st January, to qualify for reseller status, an applicant must :-

1. Have registered at least 200 .ie domains, or be the current BillC on 200 .ie domains
2. Provide a Deposit of €2,500, and agree that it may be used to pay for .ie renewals in the event of liquidation, receivership or other similar event. The deposit is refundable if reseller status is withdrawn or terminated.
3. Pass a credit check
4. Display a detailed knowledge of the IEDR policies and procedures
5. Display a detailed knowledge of the IEDR registration rules and requirements,
6. Display a detailed knowledge of DNS and relevant technical issues

In return, the reseller will access the following benefits of reseller status:-

1. Qualifies for the reseller rate of €29 – a 63% price reduction from the retail rate of €79,
2. Obtains access to the IEDR reseller console domain management system,
3. Will be listed on the IEDR’s approved Reseller Listing on the IEDR website
4. May use the IEDR’s official logo on websites and promotional literature.

This focus on better accreditation recognises that the Local Internet Community (LIC) is entitled to high levels of service, access to competitive pricing, high standards, and courses of redress in the event of reseller failure – either financial or technical. The IEDR is committed to working with the ISPAI and the IIA to draft an action plan (disaster recovery plan) for registrants in the event that a reseller cannot fulfil its responsibilities. IEDR commits that it will not act precipitously against registrants in such circumstances.

The changes apply immediately to new reseller applications only.

Existing resellers below 200 domains will not be immediately impacted by the above. The IEDR will work with these resellers and encourage them to increase the level of monthly registrations, to ensure that they continue to promote the .ie brand and maximise their growth potential within reasonable timeframes.

Existing resellers below 50 domains will continue to undergo a quarterly review process. Where it becomes apparent that these resellers are unable to meet their commitments, then reseller status will be terminated. During 2005 ytd, 20 resellers were de-listed as part of this process.

The bulk transfer process will be refined to provide for a situation where resellers wish to merge accounts, amalgamate with other resellers or become a sub-reseller to another IEDR reseller. We will consult further on this issue. One suggestion is the IEDR will accept a form of “negative assurance” in these situations, rather than signed declarations from AdminC’s as heretofore.

Any queries in relation to these changes should be directed to hostmaster@iedr.ie “

4. Personal Domain Names

Change :- Proposal to relax the registration policy for personal domain names.

Reason :- Expressions of interest from IEDR resellers. Over the previous three years the IEDR made a number of proposals to the larger ISPs (Eircom and BT) concerning personal domain names / subdomains. However their sales and marketing teams were not interested. Apparently, with the development of social networking and blogging the HSP's began to see expressions of interest from its hosting base.

Points of note :- One surprising outcome of the consultation process related to pricing. The IEDR proposed a '2 years for 1' promotional period, however resellers almost unanimously rejected this, favouring the simplicity of the existing pricing / billing processes. No respondent indicated a preference for sublevel domains.

Result :- Personal domain names were launched on October 31, 2007.

5. Transfer policy v2

Revised proposal to change the transfer process. (The first proposal was withdrawn following objections and concerns raised by resellers). Heretofore, IEDR policy was to implement registrants transfer requests without question on the basis that it was the registrant's right to move freely between resellers. (Mindful that in other TLD's registrants were frequently unfairly treated by unscrupulous resellers). The company involved the IIA in the consultation process to ensure that registrants' rights were not adversely affected by the proposals.

Change 1 :- New registrations to be "locked" until payment by the registrant.

Reason:- To introduce more fairness into the process. Previously resellers who had worked hard to gain a new customer found that the newly educated and informed registrant would shop-around for lower prices and transfer to that cheaper reseller without paying the initial reseller.

Result :- The proposed change helped to ensure that the initial reseller was recompensed for his efforts. Registrants rights were not affected because he could still transfer to the new reseller, pay that fee, and IEDR would increase the renewal date by one year. This also helped to reduce disputes between resellers, reduce bad feeling for poaching new registrants, reduce the wasted time from before and finally reduce the documentation (because credit notes were not required against the initial invoice). Furthermore, the previous manual system was automated in that the unlocking process was triggered by the online payment.

Change 2 :- Following an initial transfer, the domain will be "locked" and cannot be transferred again until the initial transfer is paid for by the registrant.

Reason :- To introduce more fairness into the process, and to reduce churn. Previously, canny registrants would surf between resellers without paying the appropriate renewal or transfer fees. Because resellers get 30 days credit terms, the credit notes for the initial transfer lagged behind the transfer transaction.

6. Whois service enhancements

Change 1 :- proposal to extend the whois information to *disclose the renewal date* (to ensure transparency in the renewal and billing process)

Change 2 :- proposal to extend the whois information to *disclose the domain status* - Normal, M, S, D, "locked" etc. (to facilitate domain holders ascertaining whether the domain is active or suspended)

Change 3 :- proposal to extend the whois information to *indicate "pending" domain applications* (to reduce confusion and discrepancies between the registration system and the whois, assisting in further automation for resellers.)

Result :- Proposals introduced on-target and without incident.

7. Documentation requirements :- relaxations and clarifications

Change :- proposal was to simplify and reduce the need for supporting documentation when making applications and modifications. The proposals were implemented in conjunction with the launch of IEDR's newly designed web site. The objectives included :-

- to bring the written rules into line with day-to-day practice
- to ensure consistency relating to the application procedures and policies
- to enable resellers and individual applicants to predict the success of their application prior to submission
- to bring improved clarity to the rules and regulations
- to reduce the level of physical documentation required for new registrations
- to reduce the level of real and perceived bureaucracy in the to the registration process

Reason :- simplification of processes and to facilitate automation by resellers.

Result :- positive feedback from resellers, reflected and subsequent transactions and communications.

8. Poll on reducing the Volume of automated emails from IEDR.

Change :- Reduce the volume of email notifications distributed

Reason :- Some Registrars are unhappy with the volume of emails distributed by some of the IEDR automated systems, particularly around the time of the rebuild procedure.

Points of note :- Current situation: There are two parts of the rebuild procedure which distribute emails to Registrars:

1. The DNS verification system. The DNS verification system runs 30 minutes prior to every rebuild time. i.e. 09:30am, 11:30am, 4:30pm and 09:30pm.
2. The ticket-to-domain system. The ticket-to-domain system runs at 10am, 12pm, 5pm and 10pm daily.

As matters stand IEDR DNS verification system sent 2 emails per ticket per day. Under this proposal, Registrars could receive 4 emails per ticket per day. It was IEDR's intention to change this system so that it sends 1 email per day per ticket.

Result:- The changes were introduced, following a vote by resellers. **Yes 5 votes (83.3%); No 1 vote 16.7%**

9. Poll on IE Zone reload frequency

Change: In May 2008, IEDR proposed to increase the frequency of IE zone reloads.

Reason: Faster go-live of new registrations and faster propagation of DNS and other changes to the .ie domain nameholders' contact details.

Points of note:- no objections raised to the proposals in principle, although there were some alternative timings proposed.

Result: Implementation of the new frequency of IE zone reloads proceeded. The new times were: 10:00 + 12:00 + 17:00 + 22:00 (7 days a week)

10. Reduction to 27 days for an Application Ticket

Change: Reduction in the length of a time a ticket (new domain Registration request or existing domain Modification request) can stay in the IEDR ticket queue. Currently, a ticket can remain in the IEDR system for 30 days, providing plenty of time for registrants to authenticate their claim to the desired .ie domain name.

Reason: The reason for this was connected to IEDR's credit card payment processing system (Realex), whereby credit card authorisations are only valid for a 27 day period. Any tickets which were accepted after day 27, but before day 30, were failing in making payments, because the credit card authorisation period had elapsed.

Points of note: IEDR wished to reduce the number of domains which were not paid for, and bring the respective systems into line.

Result:- As of 8 April 2010 the length of a time a ticket can stay in the IEDR ticket queue was reduced from 30 days to 27 days.

11. Conditional Acceptances Policy Amendment.

After an application is received for an RBN by the Companies Registrations Office, a customer receipt is issued by the CRO. The customer receipt has a submission number on it. There are two options for submitting supporting documentation to the IEDR at this stage:

1. Provide IEDR with a copy of the CRO customer receipt. This will be a normal acceptance and not a conditional one, as the receipt confirms that the application is simply waiting to be processed by the CRO and confirms the owner of the business and the business name.
2. Send IEDR the CRO Submission Number. (Not to be confused with the submission ID printed on the signature forms). With the Submission number IEDR can verify most details of their application – however IEDR cannot view the owner of the business application. For this reason the domain name will be accepted conditionally, on the basis that the correct holder has been provided in the application. Resellers do not need to take any further action; IEDR hostmasters will check the RBN (based on the submission number) in 8 weeks and will only contact the Reseller if there is a conflict between the holder information given in the application and the holder of the RBN.

Change: Following CRO automation and the almost elimination in queuing times, IEDR would no longer accept:

1. A request in the application remarks field to ‘conditionally accept’ the application.
2. A copy of the Signature Page. The Signature Page is presented to an applicant who files an RBN application online, they then have to print off this form, sign it and post it to the CRO with the relevant fee.
3. A copy of the printed application form for an RBN. This application form is available on the CRO website; the applicant fills in their details and must post it to the CRO with the relevant fee.

Reason: Problems that frequently arose as a result of this policy:

1. The most common problem was that applicants did not proceed to register a Business Name, or only re-commenced the CRO application process when IEDR gave 1 week notice that the domain name would be deleted
2. The number of complaints received from customers when their domain name was deleted was increasing. Customers stated that they were not aware that they had to do anything further in order to maintain their registration.
3. Domain applications were being made in the Registered Business Name (RBN) category for applicants that are awaiting their CRO number.

Points of note: When the registration requirements were not completed properly, ‘live’ domain names were deleted, which posed a particular problem as the new domain may have been operational, marketed and promoted.

Result : The practice of “conditional acceptance” of new domain registrations ceased 9March 2008). All registrations requirements must now be met before a domain can go-live on the internet.

12. Proposal to publish Registrar names for new registrations stats

Change: Proposal to publish the monthly statistics for new registrations with all the registrars names. The existing practice was publication of rankings only, for the Top 20, without disclosure of Registrar's names.

Reason: Providing more information on the Registrar Console:

1. Transparency will allow Registrars to benchmark how they are doing against those they perceive as competitors
2. Registrars can see how new entrants are performing in the market
3. Registrars can see how "the old guard" (e.g. ISPs) are performing in the market
4. Registrars can see what's possible, by comparing themselves against other Registrars operating in the same niche market
5. Comparison might spark a competitive spirit and boost new registrations
6. The information will clarify Market Share of *new* business (remember that Transfers-in are not included in the statistics).

Points of note:

Result: Registrars voted against the idea to be transparent on this matter and rejected the proposal to disclose the statistics of new registrations with Registrars' names. Registrars preferred to keep the status quo i.e. ranking of the top 20 only, with no disclosure of their names.

13. Poll on the choice of a new Accredited Registrar logo.



Change :- Poll on the proposed new Accredited Registrar Logo (May 2010).

Reason :- To give the Registrars the choice of the logo they would like to use on their website to indicate they are an IEDR Accredited Registrar

Points of note:-

Result :- Logo number 2 collected the most votes from the participants, and was adopted as the new Registrar logo.