

## Response to Consultation Paper

### Accreditation of registrars for .SG Domain Name Registration

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#### Introduction to Ascio Technologies



Ascio Technologies provides solutions and technology to enable telecom operators, web hosting companies, Internet access providers, Internet portals and other partners all over the world, to offer services in managing domain names and/or Digital Identities to their individual and corporate customers. Ascio design, market, and support software products and related value-added services that automates the registration and management of domain names and the management of Digital Identity solutions. The solutions enable partners' customers to establish and manage their online presence themselves on a global basis. Ascio has more than 120 partners in over 15 countries with offices in Copenhagen and in Munich.

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#### Introduction to Speednames Regional Services



Speednames Regional Services is the exclusive agent for Ascio Technologies' Domain Technology solutions in SouthEast Asia. Speednames' regional partners include, SingNet, Telekom Malaysia Multimedia, Lycos Asia, Maxis, Worldnames in Korea, DSP in Indonesia, AsianNet and SeedNet in Taiwan. Including her predecessor, Speednames Pte Ltd, Speednames has a presence in Singapore since Sep 1999. Speednames provide the ability to search, register and manage more than 35 ccTLDs and gTLDs.



#### Contacts



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**Organisation of our document**

Section Reference	Our statement of response
2.1 Shared Registration System	<ol style="list-style-type: none"> <li>1. We suggest that SGNIC implement a Thick registry system as opposed to a Thin registry system. This allows centralised management and maintenance of critical registration information.</li> <li>2. We suggest an automated registry-registrar process that will enable speedy and accurate registration procedures, without the need for hardcopy document presentation and visual checks.</li> </ol>
2.2 SGNIC’s plans	<ol style="list-style-type: none"> <li>1. We welcome SGNIC’s move to open up and promote wider adoption of the .SG domain</li> </ol>
2.3 Accreditation of Registrars	No comment
3.1 Responsibilities	<ol style="list-style-type: none"> <li>1. We recommend the use of email templates as the default application procedure. Automated communication protocols would be an added advantage. We suggest online verification of Business registration data with RCB instead of submission of manual business registration certificates.</li> <li>2. We suggest SGNIC provide the standard content for the domain name agreement for registrars to adopt.</li> <li>3. We suggest inclusion of “ the transactions and requirements for renewals and expirations of domains” in addition to “ registration, modification, transfer and deletion of domain names” . We suggest issuing rules and guidelines about transfer between one registrar to another as well as permission levels for modification of specific information in the NIC datafields. We also recommend relaxing the restriction of 1 domain transfer per year per owner.</li> <li>4. We agree.</li> <li>5. Issuing of bills and collection will be the responsibility of the registrars. However, we request SGNIC to offer back to back credit and payment schemes that will ensure sufficient cashflow for registrars.</li> <li>6. If a thick registry is being implemented by SGNIC there will be no need for back up to be performed by registrars.</li> <li>7. We agree</li> <li>8. We agree</li> </ol>

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3.2 Domain name – only service offering	<ol style="list-style-type: none"><li>1. We agree that domain registrars must offer pure domain name registration and domain name management solutions. Additional services should be provided only as options.</li><li>2. We also suggest that SGNIC allow registrants to transfer from value added providers to stand-alone registrars should these registrants opt to do so after the expiration of the first period.</li></ol>
4.1 Minimum number of registrars	<p>We welcome open competition for registrars in SG domains. However, with only 2 second levels, namely, com and per domains, market expansion is limited. We recommend that SGNIC monitor the actions of accredited registrars so as to prevent market cornering practises such as price dumping and lack of professionalism resulting in poor customer service.</p>
5.1 Minimum Criteria	<ol style="list-style-type: none"><li>1. We recommend the leverage and partnerships of world class accredited registrars who have harnessed the appropriate technologies to implement automated, online registrations of ccTLDs and yet constantly innovating to bring ease of use domain management features to end registrants. Such globally positioned registrars concentrate their servers in one location but deploy their services across the world, through remote support service centers.</li><li>2. In conjunction with 1. above, we recommend that such registrars would still require a strong, committed local partner with experience and knowledge. The local entity should have close contact and support from the principal registrar, but providing all the necessary customer support activities as well as education and awareness building. With reference to Section 2.1-1 above, we strongly recommend that SGNIC build a thick registry system. As such the requirement for back up would be less stringent.</li><li>3. We recommend the deployment of staff that are proficient in the technical aspects of domain name registration, as well as the service and support of the general public who may may not have the in-depth knowledge of the use and application of domain names. We do however caution that quality service comes at a price and perhaps this is an area where competing registrars are able to differentiate themselves.</li></ol>
5.2 Application requirements	<p>No Comment</p>
6.1 Performance Bond	<p>We suggest that the bond be lowered to S\$50,000.</p>
6.2 Conditions for drawing upon Guarantee	<p>We suggest SGNIC stipulate the costs of redelegation of domain names should a registrar be wound up. And the conditions of withdrawing the bond upon a registrar exiting the business.</p>

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- 7.1 Application Fee The fees specified are reasonable.
- 7.2 Performance We support SGNIC's stance to monitor the performance of registrars in order to maintain an orderly domain name registration industry. Please also refer to our comments in Section 4.1.  
We suggest a detailed list of performance criteria be spelled out in order to sieve out opportunistic applicants who are not serious.
- 8.1 Registration Fees We recommend the following :
1. Setting a recommended retail price so that registrars do not end up dumping domains for market share and cross selling their preferred products / services.
  2. A rebate to each registrar based on volume commitment. Eg. S\$ 60 recommended retail prices, \$20 rebate for volumes less than 5,000 and \$ 30 greater than 5,000. This will even the market and let Registrars sell at the same level of SGNIC.
  3. We recommend that SGNIC set one price for com.sg and per.sg respectively. Currently, the first and subsequent names registered by a company are charged progressively higher prices.
  4. We also recommend fixed price for other transactions if it is warranted. Eg. Transfer of owner / registrar.
- 9.1 Dispute Resolution We support the use of SMC and SIAC for Domain Dispute Resolution as the standard resolution processes.
- 10.1 Signed agreement We recommend that a draft agreement be made available to potential applicants who registers their intention to apply for accreditation and upon signing a non-disclosure agreement.
- 11.1 Submission No comment
- 11.2 Publication We request that all information submitted here be kept confidential.
- 11.3 Modifications to proposed scheme We request to be sent the results of this consultation exercise and also the detailed final accreditation scheme.