IE Domain Registry Limited

Policy Advisory Committee

Minutes from the 27 April 2017 Meeting



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Minutes of the Meeting held on 27 April 2017

Meeting Location: Annesley Suite, O'Callaghan Alexander Hotel, Dublin 2

Meeting Time: Called to order at 10:35am by the PAC Chairman.

Members present:

Chair	Alfie Shaw
Association of Patent & Trademark Attorneys in Ireland	Judy McCullagh
Department of Communications, Climate Action & Environment	Ciaran Byrne
Enterprise Ireland	Jim Barry
ie Accredited Registrar (Blacknight Solutions)	Michele Neylon
ie Accredited Registrar (Hosting Ireland)	Jonathan Bate
ie Accredited Registrar (Irish Domains)	Conor Moran
ie Accredited Registrar (Register 365)	Kirstine Harris
HEAnet	Aidan Carty
Small Firms Association	Linda Barry
IE Domain Registry (IEDR)	Jimmy Joyce

IEDR Representatives:

David Curtin	
Oonagh McCutcheon	

PAC Secretariat:

Sarah Keegan

1. Apologies - Members not present:

- Fred Logue ISPAI (Pre-arranged)
- Joan Ryan Department of Jobs, Enterprise and Innovation (pre-arranged)
- Kevin Thomas Irish Computer Society
- Joe Kane Law Society

Alternates attending on behalf of PAC members:

- Ciaran Byrne Department of Communications, Climate Action and Environment
- Jim Barry Enterprise Ireland
- Aidan Carty HEAnet
- Kirstine Harris .ie Accredited Registrar (Register 365)

2. Minutes from the 17 January 2017 PAC meeting

It was confirmed that the Minutes from the 17 January 2017 PAC meeting were published online, and that no further comment was received in relation to their content.

3. Review of action points from the 17 January 2017 PAC meeting

3.1. Policy Conclusion Templates

The action point from the last PAC meeting for the PAC Secretariat to compile policy conclusion templates for the following policy changes was outlined:

- Introduction of Internationalised .ie Domain Names
- Introduction of the Secondary Market
- Removal of the restriction on registering .ie domains that reflect Geographical Place Names
- · Rejection of the request to restrict .ie domains including the term 'architect'

It was noted that these were due to be distributed to the PAC for review, and it was confirmed that this was done with the drafted Minutes from the January 17th 2017 PAC meeting, and that no further comment relating to their content was received. Accordingly, the PAC Chairman gave his formal approval for the conclusion of these policy changes.

There was a request for clarification regarding the nature of the policy conclusion template, and the appropriate timing for its completion. It was clarified that where the policy conclusion template included implementation considerations, it should be signed-off after the implementation of the policy change had fully completed, or when a policy change had been withdrawn / refused.

3.2. To remove restrictions on .ie domains corresponding to TLDs

The action points from the last meeting were outlined, and the updates are detailed in Section 5.

3.3. Shortened versions of a person's first name

The action points from the last meeting were outlined, and the updates are detailed in Section 6.

3.4. Fast Track Request: WHOIS Policy & Acceptable Use Policy

The PAC were reminded that this fast track request was submitted in order to aid secondary market operations, as interested buyers would have the ability to view the current Registrar (Billing Contact) for a domain registration on its public record on the IEDR WHOIS service, who they could then engage with regarding potential re-sale.

The action points from the last meeting were outlined and it was noted that the IEDR was due to draft illustrated proposals for edits to the WHOIS and to distribute this to the accredited .ie Registrar representatives on the PAC for consideration, and to further engage with the wider accredited .ie Registrar channel on the proposed edit to the WHOIS Policy (to display the Billing Contact).

The IEDR confirmed that whilst work had begun internally on drafting the proposed WHOIS changes, it had since been noted that The Internet Corporation for Assigned Names and Numbers (ICANN) was similarly reviewing WHOIS output changes, and that it would be ideal to await their findings / decisions before taking further action at this time, so that their findings could also be taken into consideration.

After further consideration by the PAC, it was agreed that as there was no indication of when ICANN would complete their review, the proposed fast track policy change request should continue, and that the ICANN findings would be re-visited at a later time.

Accordingly, it was agreed that the IEDR would continue working on the action points from the last PAC meeting and provide further updates at the next meeting.

3.5. Fast Track Request: Privacy Policy

The PAC were reminded that this fast track policy change request was submitted to account for updates to European and National legislative changes, and that the action point from the last meeting related to the accredited .ie Registrar representatives on the PAC continuing their review of the specific text proposals with their legal advisors.

As feedback is still pending, it was agreed that the matter would be carried over to Q2 2017.

3.6. Policy Framework Proposal – Registration and Naming Policies

The PAC were reminded that they had previously found consensus for the proposal to update the framework of the IEDR's Registration and Naming Policies, which would combine the two policies into one single policy, and distinguish content under the headings of "Policy" "Process", "Procedures", "Rules" and "Guidelines".

The action points from the last meeting were then outlined, and it was confirmed that the IEDR had been due to have one final engagement with the PAC Registrars to accumulate any final edits to the text. Subsequently, the IEDR was to notify the wider accredited .ie Registrar channel of the proposed change and welcome feedback on content.

The IEDR confirmed that it had completed these actions, and had given a further 30 day notice period to the wider accredited .ie Registrar channel advising that the baseline document would be added to the policy pages on the IEDR website, <u>www.iedr.ie</u>. The IEDR then confirmed that the baseline document had now replaced the legacy Registration and Naming Policies.

4. Policy change – new requests

4.1. Proposal to remove DNS check prior to registration, change of Registrar or domain holder

Please see Appendix I for the policy change template.

The proposal was outlined for the PAC, and it was noted that under the current technical operations of the IEDR systems, validation checks are run on DNS records listed within requests for new registrations, modifications to the registrant of a domain, and modifications to the appointed billing contact. Under the IEDR Registration & Naming Policy, a minimum of two valid DNS records are required with each request and the DNS check system verifies that the DNS provided in such requests are configured to meet specific technical standards, which are outlined in RFC protocols 1034 and 1035.

The accredited .ie Registrar representatives on the PAC noted that where the DNS provided fail this check, there can be delays in the completion of requests, particularly with regard to new registration requests, which are valid for 27 days. As such, where a future registrant delays in providing the required information to support their registration request, there may be insufficient time for DNS configuration to be corrected by the hosting provider. This can further result in the request expiring, and the domain becoming available to a third party for new registration requests to be submitted on a first come, first served basis.

After further clarification was provided, the IEDR noted that the historic rationale for the DNS check was that it was industry best practice amongst other Registries at that time. Furthermore, it was implemented to ensure the stability of the namespace in the early stages of the Internet, and to ensure that Registrars operating within a namespace were technically experienced and knowledgeable.

The IEDR acknowledged that Registrars currently operating in the IE namespace were professional and knowledgeable, and further noted that there had been a change in practices

internationally regarding DNS validation by other namespace managers, with many having moved to validation after the acceptance of a request, or having ceased DNS checks entirely. As such, the IEDR confirmed that in light of these developments, that it held no objection to the proposal.

The PAC were reminded that registrants would be unable to have a website without valid DNS, and therefore, it was agreed that the majority of registrants will still be suitably motivated to ensure that their DNS are operational. However, it was further added that some registrants may have legitimate reasons for wanting to register a domain, but prefer not to host a website (e.g. brand protection etc.).

Discussion centred on the specific case of billing transfer requests being submitted which include the previous (once valid) DNS records from the previous hosting provider, which are now invalid, and the issues this can cause for registrants and Registrars.

Post-registration DNS validation reporting was then discussed. The IEDR noted that DNS records can be used as a proxy to determine the "quality" of the namespace as it provided an indicator of a website or email usage. IEDR confirmed that it will continue the analysis and reporting. The IEDR further added that they would be happy to share this information with the wider accredited .ie Registrar channel, if desired.

It was then agreed that there was consensus for the proposed change, as it represented international best practice. Accordingly, it was decided that the PAC Secretariat would liaise with the proposal submitter, Blacknight Solutions, to form a mini-working group. It was considered that a Public Consultation would be highly unlikely to be required. The mini-working group will design documentation outlining the proposal for the non-attending PAC members, requesting their feedback and ensuring that full consensus for the proposal exists amongst the PAC, in line with the policy development process. Further updates will be provided at the next PAC meeting.

4.2. Proposal to alter the IEDR Registration & Naming Policy to remove the requirement to demonstrate a claim to a dot IE domain

Please see Appendix II for the policy change template.

The IEDR outlined the existing Registration & Naming Policy requirements, which require that future holders provide: -

- a. a real and substantive connection to the island of Ireland
- b. a claim to the domain applied for

Managed Registry

It was noted that the founding fathers of the IE namespace had opted for a managed registry model at its inception, and with this, it was intended that the above criteria would deter cyber-squatting in the IE namespace, thus avoiding the need for defensive registrations. By implementing this registration criteria, it was expected that good names (e.g. flowers.ie) would be used and not lie idle (as only those with a legitimate use would be able to register).

The IEDR noted that it had considered at some depth the namespace's USP. The "identifiably

Irish" connection, and the need for a real and substantive connection to Ireland, were identified as the most significant elements of the USP, as the namespace is reserved only for those with legitimate Irish connections.

Furthermore, the IEDR acknowledged that consumers have a strong sense of trust in the IE namespace as the IEDR verifies the identity of registrants, e.g. website owners, so that consumers can interact online in the IE namespace with confidence, knowing that the IEDR has completed these checks.

Why now?

With the release of over one thousand new gTLD choices in recent years, many of which enforce no registration requirements, it was noted that the IE namespace needed to be become more competitive and be more responsive to Irish consumers' needs.

It was also noted that under the current Registration Policy, it was more challenging for some applicants to register a business, personal, family or blog name, than it should be, despite the fact that they were Irish citizens / residents or had a substantive Irish connection. In some cases, it was noted that some registrants with perceived "stronger" claims were required to provide a more detailed level of information to support their registration request, than others with a less apparent claim.

As such, the IEDR acknowledged that there was an evident need to review the Registration and Naming Policy and the registration requirements.

During this review, the IEDR became aware that other ccTLD operators were moving away from brand protection activities, as were brand owners, who had begun to take a reactive stance to brand protection (partially in response to the release of the new gTLDs, which meant it was costly to protect brands in every new namespace).

Furthermore, the IEDR noted that during the recent creation and implementation of the new framework for the Registration & Naming Policy, it became apparent that the registration guidelines, which had been updated over time to account for corner cases, now spanned 7 pages. On consideration of this, the IEDR determined that it was necessary to undertake a review of the registration process in order to address the overly-lengthy nature of the registration guidelines, which could potentially act as a deterrent, or cause confusion, amongst interested applicants.

As such, in response to these factors, the IEDR feels that now is an appropriate time to propose the removal of the claim pre-condition from the registration process. This would effectively allow anyone with a real connection to Ireland to register any domain they want without further inconvenience.

Registration Safeguards

Discussion centred on the safeguards within the existing Registration & Naming Policy, in addition to the Registrant Terms and Conditions and the IE Dispute Resolution Policy (DRP), which could be used in cases of abuse of the Registration & Naming Policy, or domain disputes.

It was noted that the DRP is operated independently of the IEDR by the World Intellectual Property Organisation (WIPO), and it was confirmed that these mechanisms would remain in place to act as a remedy to abuse, or as a means through which such activities could be disputed and resolved.

Benefits of the Proposal

It was noted that removing the claim pre-condition from the Registration & Naming Policy would result in a faster and easier registration process for IE users, Registrars and the IEDR.

Furthermore, it was acknowledged that the proposed change would ensure that the registration process is deterministic, and that it would also make a registrant's subsequent applications for additional domains easier to complete.

There was agreement that the proposed change would represent a significant improvement in the user experience when dealing with dot IE, and would address the perception that a dot IE domain is difficult to get, which influences some disenchanted registrants to obtain dot COM domains for subsequent registrations.

The IEDR further noted that the proposal may work to address the number of applications which expire before completion due to outstanding supporting information, which currently account for approximately 10% of all new registration requests.

Changes in Consumer Expectation & Demand

Discussion focused on the change in consumer expectations for fast and efficient service. The recent re-design of a number of Government websites was referenced as an example of the need to ensure that the registration process is enhanced to ensure that it is efficient, and easy to understand, requiring minimal intervention, whilst upholding the IE namespace's USP.

It was also noted that the source of demand for dot IE websites had changed from established "bricks and mortar" businesses, to new start-ups eager to get an online presence before further progressing their business plans. The IEDR estimated that almost two thirds of its recent new registrations were categorised under an option typically used for future businesses / blogs etc.

As the source of demand had clearly shifted, the IEDR acknowledged that there is a need to accommodate such registration requests and to further ensure that the registration process for these applications is efficient and simple, in order to avoid dropped applications, and a poor user experience for those with legitimate Irish connections.

Developing the IE Namespace

The IEDR advised that there is significant opportunity to grow the dot IE brand, and added that there is untapped potential within the Irish market, as IE subscribership is notably below that seen in the Benelux and Scandinavian regions.

It was noted that the proposed removal of the claim requirement would positively impact this, and potentially lead to the growth of the namespace. The IEDR also commented on the fact that a significant portion of claims provided are more frequently linked to future endeavours, and

therefore, are intangible and challenging to verify. Accordingly, the IEDR felt that the claim requirement no longer contributed to the dot IE namespace's USP and that its removal would have a significant impact on the development of the namespace.

There was also agreement amongst the PAC members present that the proposal reflected the international best practice of exception handling. The noted cooperation of ccTLD operators, including IEDR, with law enforcement to address matters of illegality was acknowledged. It was further noted that historically, no action was taken by ccTLDs without Court Orders. However, the IEDR remarked that many TLDs now operate protocol arrangements and mechanisms for engagement with law enforcement, where necessary.

Policy Change Proposal Progression

After discussion, there was agreement for the progression of the proposed policy change in line with the Policy Development Process, including for the establishment of a Working Group to review the proposal and for the launching of a Public Consultation in due course.

There was further agreement that it would be of utmost importance to undertake an extensive awareness campaign for the proposed policy change, and to ensure that it is appropriately marketed, in addition to ensuring that ample notice is provided before the change is implemented. The importance of notifying existing registrants of the proposed policy change during this awareness campaign was also acknowledged.

The PAC confirmed that they are eager to undertake an extensive review of the proposal, and the accredited .ie Registrar representatives on the PAC noted that the proposed change would represent a very positive evolution for the namespace, and one indicated it would significantly reduce its administrative cost associated with handing dot IE requests.

Discussion turned to the challenges faced by large multinationals at present when attempting to register domains for future products and brands, and the subjective nature of the existing registration process, which can lead to delays in the registration process, particularly where clarifications are required.

There was discussion on the impact of the proposed change on the level of trust in the IE brand amongst consumers, and the IEDR advised that it had undertaken significant risk impact assessment before proposing this change, particularly with regard to IE domains being used for defamatory purposes. On review, the IEDR advised that the likelihood for such instances was particularly low, as those intending to engage in such activities would be more likely to use social media platforms, due to the immediate nature of the services, and the lack of cost involved (as opposed to paying for a domain registration and hosting, in addition to designing a website).

It was also noted that whilst defamatory actions have a significant impact on the individual / company involved, the relative impact on the wider community (and on the security of the namespace) is rated as "low".

Informational & Awareness Campaign

It was acknowledged that there was an (incorrect) perception that the IEDR holds domains for brands etc. to ensure that no one else can obtain such domains. The IEDR and Registrars

commented anecdotally that they occasionally receive calls from brand / business owners, advising that someone else has "their domain name".

Dot IE domains have historically been available for registration on a first come, first served basis to any party that can show a real connection to Ireland and claim to the domain. The IEDR will accept the registration to the first party that applies, and successfully demonstrates their compliance with this criteria.

On this basis, it was noted that there was a need to undertake an extensive informational and awareness campaign, to ensure that the General Pubic were informed of the IEDR's Policies, highlighting the significant benefits associated with this policy change proposal.

It was also acknowledged that the proposed change will be particularly beneficial to new start-up businesses, eager to get their online presence established. Members of the PAC further commented on the welcome removal of bureaucratic red-tape from the registration process.

The IEDR advised that it would be happy to handle the design and expense of material for the awareness campaign, and would be particularly happy to undertake co-funded education and content marketing activities with any interested PAC member.

The value and high quality of previous content marketing pieces distributed by the IEDR was noted by members present, and the IEDR noted that it welcomed suggestions for topics of future content.

Shift in Brand Owner Behaviour

Discussion turned to the recent gTLD release and the performance of the Trademark Clearing House.

As noted earlier in discussions, the shift in brand protection strategy had resulted in brand protectors using domain watch services, notifying them if their IP was reflected in registered domain names throughout various namespaces.

Accordingly, it was noted that brand owners and protectors were becoming very familiar with the need to proactively use such services to protect their IP, rather than relying on the policies of the various namespaces, or engaging in defensive registrations, which is particularly costly due to the number of namespaces now available.

Protection Mechanisms

Discussion returned to the formal dispute resolution process operated by WIPO, and the applicable criteria were considered. It was noted that the process was costly, between €1,500-€4,500 per dispute.

The IEDR acknowledged that there may be a need to consider the introduction of an "Appeals Lite" mechanism to address domain disputes through an informal dispute resolution process.

Discussion centred on the challenges and benefits of Nominet's Dispute resolution process, and the Uniform Rapid Suspension Process (URS) operated in many gTLDs, in addition to the criteria that could apply to an informal dispute process in the IE namespace.

There was a strong recommendation from the PAC that any such process should involve mediation by an independent third party.

Improving understanding of the connection to Ireland

The accredited .ie Registrar representatives on the PAC requested that the IEDR work to design a comprehensive, deterministic list of the documentation / information that shows a real connection to Ireland, which would be of particular use to their staff when engaging with applicants regarding new registration requests. The IEDR agreed that this list would be drafted and distributed in due course for discussion purposes.

Working Group

The Working Group was established in line with the Policy Development Process. Representatives from the following organisations volunteered to join the group. Non-attending PAC members will be informed and may also wish to join.

- Association of Patent & Trademark Attorneys
- Hosting Ireland
- Small Firms Association
- Irish Domains
- Blacknight Solutions
- Register 365

Next Steps:

IEDR will engage with the Data Protection Commission and the Competition and Consumer Protection Commission, who don't hold permanent membership on the PAC, but have previously offered to provide their input on relevant policy changes, on request.

As such, the IEDR will discuss the proposal with these organisations and request their feedback, which will be presented to the Working Group and the PAC in due course.

5. Policy change – to remove restrictions on .ie domains corresponding to TLDs

The PAC were informed that there had been no progression of this policy change proposal since the last PAC meeting.

The PAC were reminded that consensus for this policy change was confirmed at previous PAC meetings, and that the Development Group responsible for reviewing this policy change were tasked with finding a suitable release mechanism for three domains which have historically been held by the IEDR on the grounds that they correspond to gTLD extensions.

The affected domains were confirmed for the PAC as:

- Post.ie
- Aero.ie
- Coop.ie

Discussion then centred on the most appropriate means through which to release such a small number of domains. Possible options, such as inviting tenders for the domains was considered, along with a random day release model. The IEDR then outlined the release mechanisms typically used by other Registries, which include:

- Phased Release (Sunrise, with Auction, if multiple bidders)
- Lottery
- First Past Post

After consideration, it was agreed that the PAC Secretariat would engage with the Development Group reviewing this proposal to assist in building consensus on a release mechanism.

6. Policy change – to allow shortened versions of a person's first name with regard to Personal Name Domain applications

The PAC were informed that there had been no progression of this policy change proposal since the last PAC meeting.

Furthermore, on consideration of the fact that the proposal in Appendix II would be impacted by the proposed removal of the claim requirement from the Registration & Naming Policy, it was agreed to place this policy change on hold, to be re-visited at a later time, once the proposal to remove the claim pre-condition had been further considered.

7. Any Other Business

7.1 Industry related developments / relevant legislative changes

Topics discussed included:

• Post IANA Stewardship transition changes (including new ICANN byelaws)

- Lack of a formal relationship between Ireland and ICANN (with the exception of the Irish Government joining the Governmental Advisory Committee in January 2015)
- Legislative changes with regard to Data Protection

7.2 Irish Internet Association (IIA)

It was confirmed that a new Board of Directors had volunteered, and the organisation recently re-launched. It was further added that the organisation has begun holding events, including breakfast briefings, and intends to hold the Net Visionary Awards later this year.

It was added that no general manager has yet been appointed, but that the organisation is actively taking membership.

7.3 Annual Report

It was confirmed that the Annual Report outlining the PAC's operations in 2016 was being drafted, and will be distributed to the PAC members in the coming days.

8. Next Steps

PAC Secretariat will:

- Establish an email address for the Working Group reviewing the proposal to remove the claim pre-condition from the IEDR Registration & Naming Policy
- > Distribute the Annual Report to the PAC for review.
- Engage with the Development Group reviewing the removal of the restriction on domains corresponding to TLDs regarding the release mechanism for a number of currently restricted domains.
- Engage with Blacknight Solutions to assist with the design of documentation regarding the proposal to remove the DNS check requirement, so that the proposal can be outlined in detail for the non-attending PAC members, prior to requesting their feedback / ensuring full consensus for the proposed change exists.

✤ IEDR will:

- Engage with the accredited .ie Registrars regarding proposed changes to the WHOIS Policies.
- Engage with the Office of the Data Protection Commissioner and Competition and Consumer Protection Commission regarding the proposal to remove the claim precondition from the Registration & Naming Policy.
- Develop a comprehensive list of single documents / information pieces that provide a real connection to Ireland and distribute to the accredited .ie Registrar representatives on the PAC.

9. Next Meeting

PAC Secretariat will engage with wider PAC to set a date for the next meeting, expected to be held in mid-June 2017.

Appendices

Appendix I

1	Proposal Originator Alan O'Reilly alan@blacknight.com_0876166219 Blacknight
2	Date 21st April 2017
3	Policy Proposal Name: Remove NS check prior to registration, transfer or change of owner.
4	Policy Proposal type: Modify
5	Purpose and benefits of the proposal : Remove technical barrier to registration and improve registration time lines. Improve customer experience. Move process in line with other registries
6	Please indicate any perceived problems (issues you envisage) None
7	Policy proposal grounds: please indicate the reasons for your proposal (what is wrong/missing/inadequate etc. with the status quo?) It adds a complicated extra requirement to non-technical registrants and unneeded extra manual task to an already overly manual process for no added benefit. It can be worked around by those know now also so the is pointless.
8	Policy term proposal: Permanent
9	 Policy statement/text: Current Policy Text (if modification): 3.1 (ii) The configuration of the nameservers provided is then tested to ensure that both DNS records meet our requirements. This is referred to as the Technical Pass. 3.1.1 (v) Provide a minimum of two valid nameservers, which have been setup with authoritative zones, in accordance with RFC protocols 1034 and 1035. In this regard, it may be helpful to read section 5 below. If you are unsure what this requires, we strongly recommend that you contact an accredited .ie Registrar to handle your application 3.1.2.1. Exception (iii) The DNS checks must pass for the domain holder to be granted the right to use the domain, in accordance with all applicable terms and conditions, policies, and rules of the Registry. 3.1.2.4 (ii) A minimum of two nameservers must be provided, and both must be correctly configured with authoritative zones to host the domain in question. These valid nameservers must be purchased from a hosting provider in advance of applying for a .ie domain. 3.4.3.2 (ii) Nameservers must be configured with authoritative zones to host the domain, in accordance with RFC protocols 1034 and 1035. 5 (i-v) If the nameserver checks fail, an email notification is sent daily to the Technical Contact listed for the domain, advising that they need to correct the issue.

Appendix II

1	Proposal Originator David Curtin, dcurtin@iedr.ie, 01-2365400, IEDR
2	Date: 27 April 2017
3	Policy Proposal Name: To remove the policy requirement to provide proof of a claim to the .ie domain name as a pre-condition within the IEDR Registration & Naming Policy (Retaining the existing Connection to Ireland requirement).
4	Policy Proposal type: Deletion
5	 Purpose and benefits of the proposal : <i>Please state the benefits of your proposal</i> To ensure that the registration process for those with a legitimate connection to the island of Ireland is more deterministic in nature, enhancing the user experience for IE registrants. Greater determinism in the registration process will also benefit IE Registrars, IEDR and IE users, as it will reduce the administrative processing times, further ensuring that requests are processed more quickly. The proposed change will also allow those with legitimate connections to Ireland to get the IE domain they need without undue delay / inconvenience / restrictions, particularly new business start-ups who prefer to get an online presence before setting up a physical location for operations. This will particularly help to address the perception that it is difficult to get a dot IE domain, and allow for the development of the namespace.
6	Please indicate any perceived problems (issues you envisage) The IEDR does not anticipate issues, as the proposed change will result in an enhanced, and more deterministic registration process for those with legitimate Irish connections, for IE Registrars and for the Registry. However, to reassure stakeholders there may be a need to consider the introduction of additional domain name dispute mechanisms, perhaps with independent mediators, and a process which is faster, less formal and more affordable than the existing formal IE Dispute Resolution Policy, which is managed by an independent third party (the World Intellectual Property Organisation - WIPO).
7	Policy proposal grounds: please indicate the reasons for your proposal (what iswrong/missing/inadequateetc. with the status quo?)The proposal has been submitted on the grounds that consumer behaviour has changed, from establishedbusinesses applying for domains, to new start-ups who are eager to get an online presence. As the legitimacy ofclaims based in the future cannot be verified, there is a need to ensure that those with legitimate Irish connectionscan still get the domain they want without undue delay / inconvenience or restriction.Furthermore, consumer expectations for immediate / fast results mean that in order to develop the namespace, there is a need to ensure it operates at optimal efficiency.The IEDR is also aware that a perception exists whereby some believe it is difficult to get a dot IE domain. As the
	IE namespace is reserved for those with Irish connections, the IEDR believes it is important to ensure that those who meet this criteria can register the IE domain they want, as quickly and simply as possible, to ensure a positive user experience for IE users.
8	Policy term proposal: Permanent
9	 Policy statement/text: Current Policy Text (if modification): It is intended that all references to the claim to the name pre-condition within the IEDR Registration & Naming Policy will be removed. The most significant changes will result in the removal of claim references from the Policy Statement (Section 2), in addition to the: deletion of detailed registration Guidelines on pages 15 to 19 inclusive (Sections 3 1 3 1 to 3 1 3 7) and
	 deletion of detailed registration Guidelines on pages 15 to 19 inclusive (Sections 3.1.3.1 to 3.1.3.7), and insertion of revised Guidelines (see attached for illustration purposes). deletion of Personal Domain Names guidelines (Section 3.1.2.2 (ix)) deletion of references to "Registrant Classes" and "Domain Categories" (Appendix II)