

Children's Charities' Coalition on Internet Safety



Nominet UK
Sandford Gate
Sandy Lane West
Oxford
OX4 6LB
England

10th July, 2004

Dear Sirs,

Re: Consultation on Terms and Conditions

We very strongly support the view expressed by the IWF and would like to develop their point further.

As a matter of policy we think Nominet should not accept registrations where the proposed new name could reasonably be understood as meaning that child pornography is likely to be made available at that location. To do otherwise would put Nominet in the position of aiding and abetting the advertisement of illegal images, and that is itself also a crime. To the extent that any automated processes might make the administration of such a policy more difficult to apply, Nominet should seek appropriate advice on how those processes might be modified to prevent or minimise the risk of it happening. The IWF has, for example, developed a database of names which are frequently used by paedophiles and criminals to communicate the nature of various illegal materials they might wish to display or sell. It is not hard to imagine how such a database might be connected to your registration processes.

Where Nominet is in any doubt about whether or not a given name would be likely to fall foul of this policy, it can refer the matter to the IWF for advice. Equally, where the IWF has ruled that a given, existing web site name amounts to an illegal advertisement, Nominet should cancel or withdraw the registration. Moreover, even where a web site name is not advertising child pornography but the site in fact is in the business of supplying child pornography, and Nominet has been advised of this by the IWF, that registration should also be cancelled.

Our second point concerns the locus to complain about typo-squatting or misleading domain names. Where someone manipulates or misuses a name which otherwise will or is likely to have a very strong following among children e.g. the name of a popular music group or football team, and then puts on that site material which is wholly unsuited to children e.g. pornography, then any parent whose child has or may end up at that site ought to have the right to ask you to review its continued use.

Regards

John Carr
Secretary