

Quote [extract from document located at <http://www.ogcio.gov.hk/eng/pubpress/download/edomainreview.pdf>]:

Review on the Administration of Internet Domain Names in Hong Kong

"iii. there is increasing understanding and appreciation of what constitutes good practice in ccTLD governance and administration."

That is true, and the "increasing understanding" includes an "appreciation" that the registrars increasingly have an important role in ensuring the legal & ethical use of domain names that they have registered. That means:

- i) Having a robust and well defined Acceptable Use Policy, (AUP), as part of the registration agreement.
- ii) Enforcing that policy by responding to abuse complaints in a timely manner & with zero tolerance when presented with evidence of contravention of the AUP and/or registration agreement.

It is therefore rather depressing to see that the "Guiding Principles" contained within the above document contain absolutely no reference whatsoever to legal or ethical considerations relating to the use of registered .hk domains. I would suggest that legal & ethical considerations relating to the use of domains should be enshrined as a "Guiding Principle" by way of a defined enforcement principle.

The absence of such a principle is not much of a surprise to anyone like me who is active in fighting criminal internet fraud & who regards the registrar HKDNR as little better than a 'front' company to criminal fraudsters, zombie botnet controllers & spammers by its apparent unwillingness to apply the provisions contained in its registration agreement/AUP to suspend even the most blatant criminal domains, not to mention the burgeoning number of .hk domain spammers who are exploiting the apparent 'domain for life' policy of HKDNR, no matter what criminal, spamming or abusive purposes the domain is used for.

I believe that this is an opportunity to address such serious concerns relating to the current complete abnegation of any responsibility by HKIRC/HKDNR, but I do not see any attempt to do so in the above proposals which seem little more than a recipe to continue & formalise the status quo.

Kind Regards,

Bob Harrison