

ICANN
12025 Waterfront Drive
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September 5th, 2017

Subject: SK TLD Stealth Redelegation Notice

On Friday, August 25th, 2017, it was announced that CentralNic Group PLC (LON:CNIC) has agreed to acquire the business and assets of SK-NIC a.s., the manager of the .SK ccTLD, an exclusive country code top-level domain of Slovakia.

As noted in the attached official announcement, the acquisition involves the purchase of the business, including all the property, rights and assets, of SK-NIC a.s. SK-NIC is the official manager recorded in the IANA database as the sponsoring organisation of the .SK ccTLD. The property included in this sale therefore includes the register of domains and the .SK zone, and the rights include the right to set the policy for .SK, the pricing for .SK domain names, and the right to determine the market structure.

It is clear that with this level of control being transferred, this sale should be considered a redelegation.

This transaction was conducted by the previous owner, a Slovak telecommunication company Danubiatel, and approved by the Government of the Slovak Republic. However, at no point was the local Internet community consulted or otherwise communicated with regarding this sale.

It is therefore clear that this sale should be considered by IANA as a stealth redelegation.

According to IANA rules, a ccTLD redelegation process carries certain requirements. A major requirement is a demonstration that the redelegation serves the local Internet community's interest, as outlined also in RFC 1591 (see attached).

Slovak Internet community is united around the website NasaDomena.sk. We do not agree this redelegation serves our local Internet community interest, and we do not approve such transition.

NasaDomena.sk has a significant range of supporters. A petition was signed by almost 10,000 people, a number increasing everyday. Initiative also includes 19 web-hosting companies, 13 of TOP 15 .SK registrars, maintaining more than 73% of all registered .SK domains. This initiative is also backed by major Internet service providers and telecommunication companies, as well as popular non-profit organizations.

The information stated in this letter are serious and proven. Your immediate attention in this matter is required and greatly appreciated.

On behalf of NasaDomena.sk supporters,

Ondrej Jombík



NasaDoména.sk Supporters

Total of 9924 supporters as of September 5th, 2017.
For a full list see: <https://nasadomena.sk/all>

Non-Profit

slovensko.digital



sapie



Telecommunications



Internet Service Providers



Web Hosting & Domain Registration



IT & Security





CentralNic to acquire SK-NIC

Agreement to acquire SK-NIC, A.S., Manager of Slovakia's Top-Level Domain, .sk

The board of CentralNic, the global software platform company supporting subscription web services including domain names, is pleased to announce that it has agreed to acquire the business and assets of SK-NIC, the manager of the exclusive country code top-level domain for Slovakia, .SK. The Board believes that this will represent a major, strategic and earnings enhancing acquisition for the Group.

The acquisition involves the purchase of the business, including all the property, rights and assets, of SK-NIC. SK-NIC has managed the .sk country code since 1993 and is officially recognised as the sponsoring organisation of the Slovak country-code top-level domain ("ccTLD") by the worldwide governing body, the Internet Assigned Numbering Authority ("IANA").

SK-NIC has a long term track-record of growth in domains under management, supported by strong performance by the Slovak economy over recent years. Slovakia has a population of over five million and delivered GDP growth almost double the Eurozone average for 2015. It has an estimated penetration of 63 domains per 1000 head of capita as at 31 December 2016, compared to the neighbouring Czech Republic at 121 domains per 1000 head of capita and to the UK with 162 domains per 1000 head of capita - indicating significant growth potential with competitive pricing and service levels.

SK-NIC enjoys a high domain name renewal rate of over 77%, providing consistent and attractive recurring revenues from a diversified customer base, which includes over 360,000 domains under management and over 2,100 active retailers in Slovakia.

CentralNic intends to invest to improve the SK-NIC service using the Group's superior platform technology and through the provision of new services. The team and training in Slovakia will be strengthened, placing a new emphasis on marketing, communications and retailer support. There will also be a commitment to supporting the Slovak internet community by offering a superior service at more competitive prices than provided historically. The Group will also contribute five percent of SK-NIC's revenues to a fund dedicated to projects that contribute to the Slovakian digital economy, under the terms of a co-operation agreement with the Slovakian Government.

Ben Crawford, CentralNic Group CEO, said:

"SK-NIC is a major, earnings enhancing acquisition for Group, which is wholly consistent with our growth strategy. The business will benefit significantly from CentralNic's technology

and expertise, to improve its security, resilience and growth, as well as bringing to the Group strong recurring revenues. The .sk country code adds a substantial new product and SK-NIC's network of over 2,100 local retailers extends our geographic footprint into an important new market with considerable growth potential."

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About CentralNic Group plc

CentralNic (AIM: CNIC) is a London-based AIM-listed company which develops and manages software platforms allowing businesses globally to use the internet for their own websites and email, as well as protecting their brands online. Its core growth strategy is identifying and acquiring cashgenerative businesses with annuity revenue streams and exposure to emerging markets, and migrating them onto the CentralNic software and operating platforms.

CentralNic operates globally with customers in over 200 countries. It earns revenues from the worldwide sales of internet domain names and hosting on an annual subscription basis.

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Domain Name System Structure and Delegation

Status of this Memo

This memo provides information for the Internet community. This memo does not specify an Internet standard of any kind. Distribution of this memo is unlimited.

1. Introduction

This memo provides some information on the structure of the names in the Domain Name System (DNS), specifically the top-level domain names; and on the administration of domains. The Internet Assigned Numbers Authority (IANA) is the overall authority for the IP Addresses, the Domain Names, and many other parameters, used in the Internet. The day-to-day responsibility for the assignment of IP Addresses, Autonomous System Numbers, and most top and second level Domain Names are handled by the Internet Registry (IR) and regional registries.

2. The Top Level Structure of the Domain Names

In the Domain Name System (DNS) naming of computers there is a hierarchy of names. The root of system is unnamed. There are a set of what are called "top-level domain names" (TLDs). These are the generic TLDs (EDU, COM, NET, ORG, GOV, MIL, and INT), and the two letter country codes from ISO-3166. It is extremely unlikely that any other TLDs will be created.

Under each TLD may be created a hierarchy of names. Generally, under the generic TLDs the structure is very flat. That is, many organizations are registered directly under the TLD, and any further structure is up to the individual organizations.

In the country TLDs, there is a wide variation in the structure, in some countries the structure is very flat, in others there is substantial structural organization. In some country domains the second levels are generic categories (such as, AC, CO, GO, and RE), in others they are based on political geography, and in still others, organization names are listed directly under the country code. The organization for the US country domain is described in RFC 1480 [1].

Each of the generic TLDs was created for a general category of organizations. The country code domains (for example, FR, NL, KR, US) are each organized by an administrator for that country. These administrators may further delegate the management of portions of the naming tree. These administrators are performing a public service on behalf of the Internet community. Descriptions of the generic domains and the US country domain follow.

Of these generic domains, five are international in nature, and two are restricted to use by entities in the United States.

World Wide Generic Domains:

COM - This domain is intended for commercial entities, that is companies. This domain has grown very large and there is concern about the administrative load and system performance if the current growth pattern is continued. Consideration is being taken to subdivide the COM domain and only allow future commercial registrations in the subdomains.

EDU - This domain was originally intended for all educational institutions. Many Universities, colleges, schools, educational service organizations, and educational consortia have registered here. More recently a decision has been taken to limit further registrations to 4 year colleges and universities. Schools and 2-year colleges will be registered in the country domains (see US Domain, especially K12 and CC, below).

NET - This domain is intended to hold only the computers of network providers, that is the NIC and NOC computers, the administrative computers, and the network node computers. The customers of the network provider would have domain names of their own (not in the NET TLD).

ORG - This domain is intended as the miscellaneous TLD for organizations that didn't fit anywhere else. Some non-government organizations may fit here.

INT - This domain is for organizations established by international treaties, or international databases.

United States Only Generic Domains:

GOV - This domain was originally intended for any kind of government office or agency. More recently a decision was taken to register only agencies of the US Federal government in this domain. State and local agencies are registered in the country

domains (see US Domain, below).

MIL - This domain is used by the US military.

Example country code Domain:

US - As an example of a country domain, the US domain provides for the registration of all kinds of entities in the United States on the basis of political geography, that is, a hierarchy of <entity-name>.<locality>.<state-code>.US. For example, "IBM.Armonk.NY.US". In addition, branches of the US domain are provided within each state for schools (K12), community colleges (CC), technical schools (TEC), state government agencies (STATE), councils of governments (COG), libraries (LIB), museums (MUS), and several other generic types of entities (see RFC 1480 for details [1]).

To find a contact for a TLD use the "whois" program to access the database on the host rs.internic.net. Append "-dom" to the name of TLD you are interested in. For example:

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whois -h rs.internic.net us-dom
or
whois -h rs.internic.net edu-dom
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3. The Administration of Delegated Domains

The Internet Assigned Numbers Authority (IANA) is responsible for the overall coordination and management of the Domain Name System (DNS), and especially the delegation of portions of the name space called top-level domains. Most of these top-level domains are two-letter country codes taken from the ISO standard 3166.

A central Internet Registry (IR) has been selected and designated to handle the bulk of the day-to-day administration of the Domain Name System. Applications for new top-level domains (for example, country code domains) are handled by the IR with consultation with the IANA. The central IR is INTERNIC.NET. Second level domains in COM, EDU, ORG, NET, and GOV are registered by the Internet Registry at the InterNIC. The second level domains in the MIL are registered by the DDN registry at NIC.DDN.MIL. Second level names in INT are registered by the PVM at ISI.EDU.

While all requests for new top-level domains must be sent to the Internic (at hostmaster@internic.net), the regional registries are often enlisted to assist in the administration of the DNS, especially in solving problems with a country administration. Currently, the RIPE NCC is the regional registry for Europe and the APNIC is the

regional registry for the Asia-Pacific region, while the INTERNIC administers the North America region, and all the as yet undelegated regions.

The contact mailboxes for these regional registries are:

INTERNIC	hostmaster@internic.net
APNIC	hostmaster@apnic.net
RIPE NCC	ncc@ripe.net

The policy concerns involved when a new top-level domain is established are described in the following. Also mentioned are concerns raised when it is necessary to change the delegation of an established domain from one party to another.

A new top-level domain is usually created and its management delegated to a "designated manager" all at once.

Most of these same concerns are relevant when a sub-domain is delegated and in general the principles described here apply recursively to all delegations of the Internet DNS name space.

The major concern in selecting a designated manager for a domain is that it be able to carry out the necessary responsibilities, and have the ability to do a equitable, just, honest, and competent job.

- 1) The key requirement is that for each domain there be a designated manager for supervising that domain's name space. In the case of top-level domains that are country codes this means that there is a manager that supervises the domain names and operates the domain name system in that country.

The manager must, of course, be on the Internet. There must be Internet Protocol (IP) connectivity to the nameservers and email connectivity to the management and staff of the manager.

There must be an administrative contact and a technical contact for each domain. For top-level domains that are country codes at least the administrative contact must reside in the country involved.

- 2) These designated authorities are trustees for the delegated domain, and have a duty to serve the community.

The designated manager is the trustee of the top-level domain for both the nation, in the case of a country code, and the global Internet community.

Concerns about "rights" and "ownership" of domains are inappropriate. It is appropriate to be concerned about "responsibilities" and "service" to the community.

- 3) The designated manager must be equitable to all groups in the domain that request domain names.

This means that the same rules are applied to all requests, all requests must be processed in a non-discriminatory fashion, and academic and commercial (and other) users are treated on an equal basis. No bias shall be shown regarding requests that may come from customers of some other business related to the manager -- e.g., no preferential service for customers of a particular data network provider. There can be no requirement that a particular mail system (or other application), protocol, or product be used.

There are no requirements on subdomains of top-level domains beyond the requirements on higher-level domains themselves. That is, the requirements in this memo are applied recursively. In particular, all subdomains shall be allowed to operate their own domain name servers, providing in them whatever information the subdomain manager sees fit (as long as it is true and correct).

- 4) Significantly interested parties in the domain should agree that the designated manager is the appropriate party.

The IANA tries to have any contending parties reach agreement among themselves, and generally takes no action to change things unless all the contending parties agree; only in cases where the designated manager has substantially mis-behaved would the IANA step in.

However, it is also appropriate for interested parties to have some voice in selecting the designated manager.

There are two cases where the IANA and the central IR may establish a new top-level domain and delegate only a portion of it: (1) there are contending parties that cannot agree, or (2) the applying party may not be able to represent or serve the whole country. The later case sometimes arises when a party outside a country is trying to be helpful in getting networking started in a country -- this is sometimes called a "proxy" DNS service.

The Internet DNS Names Review Board (IDNB), a committee established by the IANA, will act as a review panel for cases in which the parties can not reach agreement among themselves. The IDNB's decisions will be binding.

- 5) The designated manager must do a satisfactory job of operating the DNS service for the domain.

That is, the actual management of the assigning of domain names, delegating subdomains and operating nameservers must be done with technical competence. This includes keeping the central IR (in the case of top-level domains) or other higher-level domain manager advised of the status of the domain, responding to requests in a timely manner, and operating the database with accuracy, robustness, and resilience.

There must be a primary and a secondary nameserver that have IP connectivity to the Internet and can be easily checked for operational status and database accuracy by the IR and the IANA.

In cases when there are persistent problems with the proper operation of a domain, the delegation may be revoked, and possibly delegated to another designated manager.

- 6) For any transfer of the designated manager trusteeship from one organization to another, the higher-level domain manager (the IANA in the case of top-level domains) must receive communications from both the old organization and the new organization that assure the IANA that the transfer is mutually agreed, and that the new organization understands its responsibilities.

It is also very helpful for the IANA to receive communications from other parties that may be concerned or affected by the transfer.

4. Rights to Names

1) Names and Trademarks

In case of a dispute between domain name registrants as to the rights to a particular name, the registration authority shall have no role or responsibility other than to provide the contact information to both parties.

The registration of a domain name does not have any Trademark status. It is up to the requestor to be sure he is not violating anyone else's Trademark.

2) Country Codes

The IANA is not in the business of deciding what is and what is not a country.

The selection of the ISO 3166 list as a basis for country code top-level domain names was made with the knowledge that ISO has a procedure for determining which entities should be and should not be on that list.

5. Security Considerations

Security issues are not discussed in this memo.

6. Acknowledgements

Many people have made comments on draft version of these descriptions and procedures. Steve Goldstein and John Klensin have been particularly helpful.

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