

To: secgen@legco.gov.hk, pid@legco.gov.hk, adm@legco.gov.hk, sf&ss@legco.gov.hk, r&d@legco.gov.hk, so@legco.gov.hk, itoffice@legco.gov.hk, complaints@legco.gov.hk, accounts@legco.gov.hk, hr@legco.gov.hk, cb1@legco.gov.hk, cb2@legco.gov.hk, cb3@legco.gov.hk, cb4@legco.gov.hk, research@legco.gov.hk, library@legco.gov.hk, archives@legco.gov.hk, legaladviser@legco.gov.hk, visit@legco.gov.hk, education@legco.gov.hk, tid@legco.gov.hk, andrewleunglegco@outlook.com, jkstolegco@gmail.com, nwsclcoffice@gmail.com, arazack@netvigator.com, tyyc@netvigator.com, info@leekoklong.org.hk, jeffrey@jeffreylam.hk, tkwong@dab.org.hk, info@starrylee.com, garychk@dab.org.hk, kp@kpchan.com, priscilla@lmf.hk, kkwong@ftulegco.org.hk, iplau@reginaip.hk, paultse@paultse.org, contact@msmo.hk, mt@michaeltien.hk, honstevengo@gmail.com, frankieyick@liberal.org.hk, chiwaioffice2016@gmail.com, ysw@yiusiwing.com, fkmaoffice@gmail.com, charlesmok@charlesmok.hk, slowbeat@gmail.com, benchanlegco@gmail.com, lcc.nw@dab.org.hk, info@kennethleung.hk, amlegco@gmail.com, kkk@kkkwok.hk, kwk@ftulegco.org.hk, dennis@denniskwok.hk, chrischeungwf@gmail.com, info@cheungchiuhung.org.hk, helenawonghk@gmail.com, lkyoffice@hkptu.org, eq@eqweb.hk, legco.office.liao@gmail.com, poonsiuping@hkflu.org.hk, chianglaiwan@gmail.com, wklo@engineer.com, info@felixchunghk.com, info@ayeung.hk, wansiukin@gmail.com, info@chuhoidick.hk, contact@jimmyng.hk, juniusleg@kcho-fong.com, lcoffice@dphk.org, stoffice@dphk.org, ssoffice@dphk.org, holdenchow@hotmail.com.hk, kfshiu003@yahoo.com.hk, info@shiuachun.org.hk, orchongshinglegco@gmail.com, info@euniceyung.hk, info@drchanpierre.org, ronickchan@gmail.com, info@tanyachan.hk, info@horacecheung.com, huichifung@gmail.com, chluk@ftulegco.org.hk, lkf.legco@gmail.com, kenlau.legco@gmail.com, enquiry@civicpassion.hk, kwongchunyu@dphk.org, contact@jeremytam.hk, vincentcheng@dab.org.hk, info@tonytsewaichuen.com

From: cyber photocopy <[REDACTED]>

Date: 09/23/2020 10:32AM

Cc: enquiry@ogcio.gov.hk, info@hkirc.hk, finance@hkirc.hk, marketing@hkirc.hk, registrar<registrar@hkirc.hk>, enquiry@hkdnr.hk

Subject: Complaint: Hksar Government-designated Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company

Dear respected ladies and gentlemen

Kindly please accept this Submission from me (.hk internet domain holder) and put this in your Council's Chamber of the Legislative Council Complex related to matter of "Complaint against Hksar Government designated Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company".

Please see my original "Complaint" below this email.

I would be most grateful if you could resolve the matter of "Complaint" via either/and/or effective tabling of subsidiary legislation and other papers; reports and addresses; statements; questions; bills; and motion debates - the substance being:

a) the lack of accountability by Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company, Hksar Government designated companies in setting fees namely fee to correct incorrect outdated internet domain names whois registrant contact in .hk namespace. Currently the said are charging Hk\$500 per domain which is some 3.125 times more than price of registering .Hk domain and is a most unreasonable price. These are the direct charges but if a domain holder has domain at .hk reseller registrar the price with more margins can be even higher, for example Hk\$590, 3.6875 times more than registration price.

b) the lack of accountability by Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company, Hksar Government designated companies in handling complaints namely there is no "complaints procedure" - for domain holders against them, at the Hkirc.hk and Hkdnr.hk websites.

c) the lack of following international and reasonable standards and protocols by Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company, Hksar Government designated companies in comparison to other internet domain registries and

registrars around the world - the vast majority who "do not charge" for correcting incorrect outdated domain names whois registrant contact and those few who do charge they do so proportionately to original registration fee and not 3.125 times more or 3.6875 times more than the registration fee.

d) the lack of .hk price marketing and thus distribution by Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company, Hksar Government designated companies in the selling of .hk domains as other country-code registries do such as .de in Germany by setting much lower registry prices and making correcting and updating of the whois registrant contact information free. Thus these lower prices make the internet suffix more usable and it increases popularity. This opportunity is being wasted by Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company, Hksar Government designated companies.

e) the lack of "natural justice" by Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company, Hksar Government designated companies in crafting terms and conditions for domain holders to follow - specifically clause/s in relation to maintaining accurate whois information for domain names but on the other hand Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company, Hksar Government designated companies setting extremely unreasonable prices and difficulties for domain holders to fulfil this responsibility.

Yours sincerely

Meeku

----- Forwarded message -----

From: cyber photocopy <[REDACTED]>  
Date: Tue, 22 Sep 2020 12:46:38 +0100  
Subject: Complaint against Hksar Government designated Hong Kong Internet Registration Corporation and Hong Kong Domain Name Registration Company  
To: enquiry@ogcio.gov.hk  
Cc: info@hkirc.hk, finance@hkirc.hk, marketing@hkirc.hk, registrar<registrar@hkirc.hk>, enquiry@hkdnr.hk

Dear Sir / Madam

I wish to complain against :

Hong Kong Internet Registration Corporation Limited (Hkirc)  
香港互聯網註冊管理有限公司 non-profit-making; non-statutory, member-based 'public' company with a Board of Directors designated by Hksar Government to manage and administer .hk domain names Registry and only registrar,

and its -

Hong Kong Domain Name Registration Company Limited (Hkdnr)  
香港域名註冊有限公司 Operating arm of Hkirc for Day-to-day administration of .hk domain names

Please send me a copy of complaint procedure or please resolve the below complaint I have against them :

Background -

I wish to update the public ownership information in the internet "whois" database of my 2 internet domain names on grounds of accuracy and terms and conditions. This has been necessitated by the fact I closed the company listed linked to the 2 domains on the whois database. However, Hkdnr company has asked me to pay Hk\$500 and/or its associate CrazyDomains.Hk Hk\$590.

Complaint Details -

1) There is no listed fee structure on Hkdnr website for an ordinary beneficiary owner (me) of the domain names to become the new registrant contact, please see

<https://www.hkdnr.hk/en/change/feeschedule/> but still I am being dictated to pay Hk\$500 by Hkdnr company and/or its associate CrazyDomains.Hk Hk\$590.

2) The fee to register .Hk domain name is about Hk\$160 with certain associated registrars (Crazydomains.Hk) so this Hkdnr Hk\$500 is totally disproportionate because it's 3.125 times more than the registration price.

3) To give you the picture of the whois database changes across the world - the suffix .com, .net and .org and several other international and country code level suffixes do not charge anything for making changes to the domain names registrant contact in the whois database via their respected registrars.

4) If Hkirc and Hkdnr have been designated by Hk government to promote .Hk internet suffix, to charge such expensive prices for updating and making accurate whois database information is very unreasonable.

5) Hkdnr and Hkirc want accurate whois database information for domain names but they are not allowing changes to be made to it without levying hefty fees.

Kindly intervene in this matter urgently.

Yours sincerely

Meeku