



Summary of the registrar working group meeting and webinars on the upcoming changes related to the new administration model

February 2026

Meetings covered in this document:

- Working group meeting (English)
- Registrar webinar – 26 February 2026 (English)
- Registrar webinar – 27 February 2026 (Danish)

Only key summaries of items that gave rise to questions, input, or discussion are included.

1. Welcome

The overall timeline and previously distributed materials were presented. Participants were informed that the contracts are not final and remain subject to amendments. Participants were also informed that they could submit additional questions in writing after the meetings.

2. Overall timeline for the transition to the new administration model

The macro timeline towards 1 July 2026 (Registrar Contract I) and 1 July 2027 (Registrar Contract II) were presented.

- The new registrar contract (I) will be distributed in April 2026.
- On 1 July 2026, Registrar Contract (I) will enter into force. From this date, it will no longer be possible to register new registrant-managed domains.
- On 1 July 2027, Registrar Contract (II) will enter into force.
- By 30 June 2028, all domains must be registrar-managed. Work is ongoing to determine how any remaining domains not transitioned by the deadline will be handled.

A question was raised regarding the situation where a new registrar has not signed the new registrar contract before 1 July 2026.

Answer: Punktum dk will address such cases individually and engage directly with the relevant registrar. The "three strikes" model still applies, whereas Punktum dk encouraged the registrars to sign the contract.

3. Review of the changes effective from 1 July 2026 (Registrar Contract I)

The two primary structural changes were highlighted:

- No more registration of registrant-managed domain names
- No more registration and renewal of domain names with a duration of longer than 1 year

It was clarified that the one-year limitation is due to simplification and limiting multi-year refund processes in cases of early termination.

Punktum dk will manage reimbursements. Registrars will not be involved in the refund handling process from Punktum dk to the registrant.



It was emphasized that registrars should not register domains solely for their own use; the focus must be on (re)selling domains to customers.

Use of resellers

Registrars can still use resellers to operate, provided they comply with the same contractual obligations as registrars.

Pricing requirements on website

- Challenges have been raised regarding the requirement to specify a domain price, especially registrars using resellers.
- For many, the domain price often depends on bundled services and agreements.
- Proposal from the working group: If resellers are used, the reseller must state the price. "The registrar must provide on any consumer-facing website, in clear (..)"

Based on inputs, Punktum dk has changed the draft contract now requiring registrars and, where applicable, resellers, to publish the full price of a .dk domain name when selling directly to consumers. It has been clarified that this requirement applies only to consumer-facing sales (B2C).

Registrar actions and registrant consent

Registrars must ensure that actions on domains are made only with the registrant's express authorisation or upon the registrant's request. Clarification was requested at the working group meeting regarding the registrar's ability to suspend or close a domain in cases of misuse or non-payment.

Answer: Punktum dk will follow up on this matter.

Registrars must provide an auth-code upon request when a registrant wishes to change registrar. A related question was asked about whether domains can still be transferred without an auth code. It was clarified that transfers without an auth code are allowed, when the registrar has either the payer role, is proxy or nameserver contact, but registrars must obtain explicit approval from the registrant up front.

It was confirmed that the payer role will not be removed, and changes to the payer role will remain possible after 1 July 2026.

Personal data and publication

Where a registrant has name and address protection, registrars must retain supporting documentation.

It was clarified that publication of personal registration data follows Danish Domain Law. If a foreign registrant wishes to have their data withheld from publication in Whois, the registrar must collect documentation of name- and address protection and submit the request manually to Punktum dk. Automation via EPP is being explored.

Registrar fee

The registrar fee will no longer appear directly in the contract but will instead be published on the Punktum dk website.



Financial risk monitoring

Punktum dk can conduct credit checks and financial risk monitoring of both new and existing registrars.

4. Overview of Technical Changes Effective 1 July 2026

One-year registration implementation

The technical implementation of the one-year registration and renewal limitation was presented.

Questions were raised regarding handling previously multi-year registrations.

Answer: All multi-year .dk domain registrations will be adjusted to a one-year term, while retaining the existing 'paid until' date

Self-service

Registrants will retain access to self-service, including the ability to obtain an auth-code. It was stated that functionality may be reduced, and that the long-term continuation of the current self-service model is expected to change.

Fast Track domain transfer

The Fast Track solution was presented as a mechanism to facilitate transitions from registrant management to registrar management.

Concerns and comments included:

- Significant communication may be required between registrant and registrar.
- Risk of domains being assigned to registrars without a corresponding customer order.
- Risk of domains becoming "stuck" if withdrawal mechanisms are removed.
- Experiences from other registries indicating operational challenges.
- Whether the solution deviates from industry standards.
- Whether the feature should be opt-in.

It was clarified that:

- A pre-selection mechanism based on the Name Server Administrator (NSA) will be implemented.
- A registrant's selection and acceptance in Punktum dk's self-service solution may be considered sufficient acceptance.

Suggestions were made regarding structured confirmation mechanisms and potential adjustments to auth-code parameters.

Answer: This will be reviewed further.

Waiting list

A question was raised as to whether the waiting list functionality will operate under the registrar-handling-only model.

Answer: This will be clarified separately, but after 1 July 2026.



OTE environment/Sandbox and poll messages

A request was made for the possibility of testing additional poll messages in the OTE environment/Sandbox.

Answer: It was acknowledged that current limitations are a known issue. Punktum dk is reviewing options for expanded testing possibilities.

VID (Very Important Domain)

Punktum dk's current VID (Very Important Domain) solution will be discontinued in its existing form. As of week 9, the product was removed, and it is no longer possible to purchase the current VID service.

Existing VID subscriptions will remain active while Punktum dk evaluates a replacement solution, potentially to be developed in collaboration with registrars, such as a registry lock.

Centralized technical information

A request was made for a centralized information channel covering technical documentation, system updates, corrections, and known issues.

Answer: Punktum dk is already looking into this.

5. Review of the requirements effective from 1 July 2027 (Registrar Contract II)

It was emphasized that the material does not constitute final contract wording but is an initial description of new requirements and principles expected to be included.

Registrar competencies

The contract allows for the possibility that registrars may be required to document their knowledge (e.g. through e-learning courses).

Concerns were raised if all CCTLD's impose similar requirements. Punktum dk informed that there is no plan to require precondition test for becoming a registrar, but it will be something Punktum dk can require e.g. in connection with a control or audit.

Operational requirements

- Registrars must be able to offer a set of minimum services, e.g. registration, renewal, termination and transfers.
- Registrars must maintain documented procedures and provide clear contact information and opening hours.
- Registrars must inform registrants about the possibility of filing complaints with the Domain Complaints Board.
- Responsibility for complaint guidance if a domain name is suspended follows the party performing data and ID verification.

Execution of decisions

Registrars must be able to execute decisions from the Domain Complaints Board and communicate such decisions to registrants.

Registrars requested involvement in the development of procedural descriptions.



Answer: Punktum dk informed it was something that maybe could be discussed in the working group.

Security

Registrars must provide a public abuse contact that will be displayed by Punktum dk. Registrars may refer to their own form or email for this purpose, which will be clarified e.g. in the contract.

Multi-factor authentication (MFA) for registrar self-service systems was discussed. It was indicated that MFA is expected to become a requirement, though details will be clarified. Different views were expressed regarding whether MFA should be mandatory.

Answer: Punktum dk will take this up for further consideration before making a final decision.

Audit and enforcement

The audit framework was presented.

Regarding the "three strikes" model, it was clarified that enforcement will not be strictly automated without dialog but assessed on a case-by-case basis.

Requests were made for clearer descriptions of consequences and strike procedures and that it is considered, what it will mean if all registries implement audit requirements.

A general comment was made that contractual enforcement should be strengthened.

Cancellation of registrar agreement

If a registrar wishes to terminate their agreement, they must provide at least three months' notice.

Punktum dk may temporarily assume the role of Registrar until the registrant selects a new one. Punktum dk ability to be safe harbor in certain cases is yet to be clarified.

6. Next steps

Milestone activities and communications leading up to 1 July 2026 were presented. Further documentation and clarification will be distributed as implementation approaches.

7. Any other business

Current executive order allows 30 days to complete data and ID verification in case of a report; expected to change to 10 days in case of suspicions of abuse. Implementation is expected on 1 July 2026.

A question was raised regarding the possibility of introducing a grace period for registrar-managed domains in relation to renewal.

Answer: There is no difference between registrar-managed and registrant-managed customers regarding suspension. Domains are suspended the day after the expiry date.

A proposal was made to remove the restoration fee for late payment.

Answer: The proposal was noted for consideration.

There are no planned changes to auto-renew and auto-expire.

8. Follow-up notes from the meetings

Punktum dk has implemented the following changes to the privileges related to domain transfers: If a domain name is cancelled (not suspended), or if the registrant has an ongoing ID/data check, it is possible to transfer the domain to a new registrar.

Ongoing ID and data validation requests (i.e. with an active request) will no longer prevent a transfer, subject to the following conditions:

- In case of cloning, or where matching identifies a user ID that is not validated, the expiry date of the ongoing ID/data validation must be carried over to the new user ID.
- If matching identifies a user ID that is already validated, no new ID/data validation must be created.
- If matching identifies a user ID that already has an ongoing ID/data validation, this validation must not be overwritten.
- Domain transfers will continue to be blocked where ID/data validation has expired or been rejected.

We are currently reviewing our use of the following uncommon server status codes:

- serverDeleteProhibited
- serverRenewProhibited
- serverTransferProhibited
- serverUpdateProhibited

As part of this review, we are assessing how and when these statuses are applied to ensure consistent usage, operational clarity, and alignment with the updated administration model.