### A sign on the side of a mountain Description automatically generated

### Your details

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| --- | --- |
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I understand and agree that my submission will be made public on the InternetNZ website

I understand that my contact details will be redacted from the public version of this submission

I would like to speak to my submission with the Panel

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# Submission: answers to selected questions

## Guiding principles

### Purpose of the guiding principles

1. Do you consider that the .nz guiding principles should be visionary, holistic, inclusive and instructive rather than operational? Why / why not? What else should they be?

*I think that the principles should be visionary, inclusive and instructive. However, there is a risk with “high level” principles that they are too vague to be useful. It needs to be really clear what these will mean in practice – what does it actually look like to be guided by these principles?*

*I have written sets of principles for various projects, and despite best intentions, many times they just sit there and not actually implemented in any meaningful way. Having concrete clauses and technical, supporting operational guidance about what each principle looks like in practice could help mitigate the risk that the principles will not be used appropriately.*

*In terms of holistic, I think that the principles need to be accessible and understood by everyone in New Zealand but should speak specifically to people who will be required to make these principles a reality.*

### Rewriting and simplifying the policy framework

1. Do you think the .nz policies should be rewritten and simplified? Why / why not? If yes, how?

*Yes, simplified, rewritten principles are a good idea. I am generally happy with the proposed principles.*

*I have only answered principle-specific questions below where I have something further to add.*

### For the benefit of all New Zealanders

1. Do you think there should be a new ‘New Zealand benefit’ principle? Why / why not? Do you have any comments on the proposed formulation of the new principle?

*Yes, I am happy with a New Zealand benefit principle but think the current proposed wording needs reconsidering. It is not clear whether you want this to be for the benefit of New Zealand as a whole (“NZ Inc” for lack of a better term) or just New Zealanders. This needs to be teased out a bit more.*

*I am not sure “New Zealander” is the right word – this speaks to people with citizenship and doesn’t obviously include the many businesses and other entities within New Zealand. I think it could be broader to include “all people and organisations in New Zealand” or similar (although you would need to consider if you are also wanting the domain to benefit the many ex-pat New Zealanders as well, or if you are thinking more geographically about the country and people living here).*

### Te reo Māori and Māori participation in .nz

1. Do you think there should be a new principle on te reo Māori and Māori participation in .nz? Why / why not? Do you have any comments on the proposed formulation of the new principle?

*Yes, although I would like to be sure that you have done appropriate work alongside Māori on the wording of this proposed principle.*

### Transferring existing principles into operational guidelines

1. Do you think there should be two types of principles (guiding principles and operational guidelines to help manage the .nz domain? Why / why not?

*Yes, I am happy with this. However, you should be clear how the two interact – e.g. will there be one set of general operational guidelines or guidelines for each principle and what this means in practice. There needs to be a clear link between the principles and operational guidelines.*

## Accessibility and openness of .nz domains

### The .nz policies are written only in English

1. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?

*I am generally comfortable with these options, however “high usage” shouldn’t be the only measure for additional languages. I also think that NZ Sign Language needs to be considered early on as an additional language. I think that you should also consider the format in which the principles are published. For example, instead of putting everything in PDF documents which are hard to navigate, you could consider having easily navigable HTML content (see govt.nz webpage for example).*

1. Which option do you prefer? Why?

*I prefer Option C. The policies should be made available to as many people as possible and reflect the official languages of New Zealand and a commitment to accessibility that is a core part of digital inclusion.*

### Lack of availability of characters other than English and reo Māori alphabets in .nz domain names

1. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?

*These options seem appropriate.*

1. Which option do you prefer? Why?

*I prefer Option C, assuming that security risks can be appropriately mitigated.*

### No geographical limits on registrants

1. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?

*These seem fine.*

1. Which option do you prefer? Why?

*I prefer Option A.*

*It is unclear what the level of current.nz domain use is from people and organisations without a New Zealand link – therefore what risk can be excepted from having a “NZ link clause”. I think that having these types of restrictions is complicated, time consuming to implement and potentially exclusionary if not scoped appropriately. However, I don’t think it is necessary to do wide, proactive communications to inform domain name holders that “anyone can have a .nz domain”.*

### Technology specific approach

1. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?

*Seems fine to me.*

1. Which option do you prefer? Why?

*I prefer a technology neutral approach. Is there an option to have additional tech-specific operational guidance in instances where this might be needed?*

## The .nz domain space and Māori

### Engaging with Māori in the policy-making process

1. Should there be a requirement to take reasonable steps to engage with Māori when amending the .nz policies? Why / why not?

*Yes. It is unclear if this refers to changes that might be made to policies as a direct result of this review, or in future amendments – but it should be both. Māori engagement should be a priority at this stage, and further work on developing new re-writing of policies should be paused until there is appropriate Māori engagement in place – this cannot be an add on to the process.*

### Building strong capability within InternetNZ to engage with Māori

1. Should InternetNZ ensure it has adequate capability to facilitate engagement with Māori? Why / why not?

*Absolutely. And this should go beyond having one person on staff as a Māori engagement lead or similar, capability needs to be built throughout the organisation and additional capacity requirements identified and prioritised.*

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