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

# How to use this submission template

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This template contains a full summary of the questions in the Options Report. You may wish to respond to one, many, or all of them.

For ease of navigation we have included the headings and options from the full Report.

You are welcome to use the template, or make a submission through other means.

We are interested in any views you have. If you are able to support your views with evidence, we are keen to see this too. This might include facts, figures, research, or examples.

For the purposes of your submission on this paper, you should include your name (or your organisation’s name) and your contact details.

You can make your submission by:

* Email to dotnzreview@internetnz.net.nz
* Post to PO Box 11-881, Manners Street, Wellington 6142, New Zealand

Submissions are due by **Friday 14 August**.

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##

### Your details

|  |  |
| --- | --- |
| Name | Anonymous submission by a person previously involved with domain names |
| Email address |  |
| Contact phone number |  |

☐**YES** I understand and agree that my submission will be made public on the InternetNZ website

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

☐**NOT ESPECIALLY, BUT WOULD BE HAPPY TO CLARIFY MATTERS IF NEEDED**, I would like to speak to my submission with the Panel

## Guiding Principles

### Summary of proposed changes to the guiding principles for .nz

The Panel intends to recommend that the guiding principles for .nz be:

* .**nz should be secure, trusted and safe:** .nz infrastructure should be dependable and secure and .nz be a domain space people trust and feel safe using.
* **.nz should be open and accessible:** The .nz domain should be an inclusive space where everybody can observe, participate, innovate and enjoy online benefits.
* **.nz should be safe-guarded and operated for the benefit of New Zealanders:** The .nz domain space should be safe-guarded and operated for the benefit of New Zealanders, reflecting and being responsive to our diverse social, cultural and ethnic environment.
* **.nz should support te reo Māori and participation in .nz by Māori**: The .nz domain space should contribute to the protection and use of te reo Māori and facilitate participation in the .nz domain space by Māori.
* **.nz should enable New Zealand to grow and develop:** The .nz domain space should help people, businesses and organisations connect, create, innovate and grow.

The Panel intends to recommend that the .nz policies contain the following operational guidelines:

* **First come, first served:** A domain name will be registered on a ‘first come, first served’ basis if it is unregistered and available for registration.
* **Restrictions on use should be minimised**: The ccTLD manager should keep restrictions on the way domain names can be used to the minimum necessary to enable the .nz domain to be trusted and safe.
* **Structural separation:** Regulatory, registry, and registrar functions are structurally separated.
* **Clear chain of relationships:** Registrants have agreements with their registrar, and all registrars with the registry and with DNCL. Where appropriate the DNCL can intervene in these relationships consistent with this policy, the .nz policies and associated agreements and contracts.

|  |  |
| --- | --- |
| 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? |
| Yes. |
| 2. | Do you think the .nz policies should be rewritten and simplified? Why / why not? If yes, how? |
| No objection in principle. It depends on what the new policies are. |
| 3. | Do you think there should be a new ‘secure, trusted and safe’ principle? Why / why not? Do you have any comments on the proposed formulation of the new principle? |
| Yes, except that losing “no concern for use” puts INZ / DNCL in the situation having to be a judge in areas outside its competencies. I’d prefer a strengthening of relationships with suitably experienced external agencies to remove concerns around scam & hate speech. |
| 4. | What would be the main benefits and disadvantages of moving from a ‘no concern for use’ approach to a ‘secure, trusted and safe’ approach? |
| See answer to question 3 |
| 5. | Do you think there should be a new ‘open and accessible’ principle? Why / why not? Do you have any comments on the proposed formulation of the new principle? |
| Yes. I thought we already had this, perhaps it was unstated. |
| 6. | 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? |
| Not sure. Who would be the judge of this? |
| 7. | 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? |
| As a surrogate for New Zealand society, our treaty obligations need to be met by the administration of .nz. I don’t have sufficient knowledge in this area to have any useful input. |
| 8. | Do you think there should be a new guiding principle on enabling New Zealand to grow and develop? Why / why not? Do you have any comments on the proposed formulation of the new principle? |
| No opinion |
| 9. | 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. Unless there are operational guidelines the guiding principles will become large and unwieldy. |
| 10. | Do you agree that the ‘rule of law’ principle should not be retained as an operational guideline? Why / why not? |
| Not sure I understand this. As noted New Zealand law applies to the operation of the .nz domain name space. No foreign laws should ever be applied. |
| 11. | Do you think the ‘first come first served’ principle should be modified and retained as an operational guideline? Why / why not? |
| Yes. It provides a quick low cost facility for registering domain names. |
| 12. | Do you think the ‘first come first served’ principle should be modified and retained as an operational guideline? Why / why not? |
| Registrant rights come first principle should be retained. Domain names are effectively a form of property and should only be lost following the decision on the basis of facts judged by a competent authority. |
| 13. | Do you agree that the ‘low barriers to entry’ principle should be removed? Why / why not? |
| Not until the plans for this are further expanded and it is shown how low barriers to entry are at odds with it. |
| 14. | Do you agree that the ‘no concern for use’ principle should be modified and retained as an operational guideline? Why / why not? |
| Yes. Illegal activity should be removed from the .nz space. |
| 15. | Do you agree that the ‘structural separation’ principle should be retained as an operational guideline? Why / why not? |
| Yes |
| 16. | Do you agree that the ‘clear chain of relationships’ principle should be retained as an operational guideline? Why / why not? |
| Yes |
| 17. | Should the Panel consider any other principles? |
| - |
| 18. | Is there anything else the Panel should bear in mind when making recommendations on the principles or operational guidelines for the .nz policies? |
| - |

## Accessibility and openness of .nz domains

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

* Option A: the current situation
* Option B: Make the policies available in te reo Māori as well as English
* Option C: Make the policies available in te reo Māori and take other accessibility measures like adding other languages over time according to how widely used they are

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| 19. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| I’m not sure about how other languages widely used in New Zealand will be determined, but am not opposed to it in principle. |
| 20. | Which option do you prefer? Why? |
| C. |

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

* Option A: the current situation
* Option B: support additional characters as demand arises
* Option C: support all characters for most widely used New Zealand languages

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| 21. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Reasonable. |
| 22. | Which option do you prefer? Why? |
| Either A or C are good.I’m not sure how demand for B would be assessed. |

### No geographical limits on registrants

* Option A: The current situation
* Option B: Educate .nz users that .nz domain names can be held from anywhere around the world
* Option C: Impose a local presence requirement

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| 23. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| They are reasonable |
| 24. | Which option do you prefer? Why? |
| I would like to see a .nz presence requirement to give consumers added confidence when dealing with websites that have .nz in the name. |

## Security and trust

### Domain and website content abuse

* Option A: The current situation
* Option B: ‘No concern for use’
* Option C: Suspension of a domain name on advice by a trusted notifier
* Option D: Implement an ‘acceptable use’ policy

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| 25. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
|  |
| 26. | Which of these options do you prefer? Why? |
| I prefer Option B.Option A provides very little additional protection over option B and IIRC the abilities of supporters of the Australian terrorist to promote their hate speech & distribute the video and manifesto were not affected by it or only affected to a minor extent.Option D is resource intensive and places the DNC in the position of having to judge website content. I recently ran foul of an acceptable use policy on YouTube where a satiric video was temporarily removed for breaching their Covid-19 restrictions. They relented when I pointed out to them that it was obvious satire and why a) nobody was going to take it seriously & b) the statistics given on infection control by masks was pretty much (within the limits of comedic exaggeration) the same as the official figures. Option C appears to have problems of its own. The Office of Film and Literature Classification already has the power to instruct that harmful content is removed, I would have no objection to allowing them to instruct that domains insisting on displaying harmful or illegal content be removed, but other government departments who parliament has not chosen to give equivalent powers to should not. They would need to demonstrate a need to a competent NZ court of tribunal.BTW I am concerned with the list of trusted notifiers you have.They must really be trustworthy and stay within within their domains of knowledge. As an example in 2013 the New Zealand website The Daily Blog parodied the police’s inaction over the Roast Buster scandal. According to the editor of the blog <https://thedailyblog.co.nz/2013/11/07/breaking-police-threaten-daily-blog-editor-with-6months-imprisonment-5000-fine-for-parodying-their-roast-buster-rape-inaction/> , a police officer threatened the editor of the blog with fines and imprisonment if the parody was not removed. If they were a trusted notifier they could simply have had the domain taken down. If you were to pursue this approach, the criteria for being trusted would need to be considerably tightened. On the other hand you are missing the human rights commission, the obvious candidate in the field of human rights. |

### The interim emergency circumstances clause

* Option A: Allow the interim policy to lapse
* Option B: Make the interim policy permanent as it is currently phrased
* Option C: Modify the interim policy and make it permanent

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| 27. | Do you agree with our assessment of the options? Why / why not? |
|  |
| 28. | Which of these options do you prefer? Why? |
| A. I am concerned that there may be scope creep. In a genuine emergency it could be reinstated. |

### Domain name registration abuse

* Option A: Current situation
* Option B: Introduce data validation for all domain name registrations

#### Option C: Introduce data verification for high risk domain name registrations

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| 29. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 30. | Which of these options do you prefer? Why? |
| A. The others would add additional costs and probably be futile. Unless registrars went to the trouble of verifying a physical address, it would be easy enough to fraudulently use someone else’s name and address in contact details with an anonymous email address and throw-away phone number. |

### Grace periods and domain tasting

* Option A: The current situation
* Option B: Removal of grace periods
* Option C: Adopt different policies towards new registration and renewal grace periods

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| 31. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 32. | Which option do you prefer? Why? |
| C. Second choice A. As the current situation does not require registrars to refund registration fees to their customers, I’ve not heard of domain tasting happening in New Zealand. C provides protection for customers who have difficulties with a renewal. |

### Misleading, deceptive, and offensive domain names

* Option A: The current situation
* Option B: Introduce a ‘reserved and restricted names’ policy

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| 33. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| I fail to see any justification how Option B’s banning “offensive” terms would “Help make the .nz domain space more trusted and secure” |
| 34. | Which of these options do you prefer? Why? |
| A as automatic scanning of names for strings leads to absurd situations like the banning of shitakemushrooms.com. See <https://en.wikipedia.org/wiki/Scunthorpe_problem> BTW: New Zealand midfielder Clayton Lewis was signed to Scunthorpe United FC from 2017 to late 2019.To ensure that NZ cultural norms are respected, any ban would need to be vetted by humans who were raised in New Zealand. I have seen unverified reports that Facebook routinely bans adverts by gay dating sites because they choose to outsource advert vetting to countries where being gay is illegal. It would be intolerable for domain registrations in NZ to be banned because of systematic bigotry in the vetting process. |

### Ensuring security best practice across the .nz domain name system

* Option A: The current situation: Registry has no levers to monitor or improve registrar security
* Option B: Require all registrars to adhere to minimum security standards
* Option C: Incentivise or mandate security features or practices

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| 35. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| I would like to see option C split into two:C: Incentivise ...D: Mandate ... |
| 36. | Which option do you prefer? Why? |
| D. The protection of the registrant should be a high priority & allowing a domain name to be hijacked cold severely impact on a business. If it’s a mistake by the registrant, *c’est la vie*, but it would be intolerable for it to be because of slackness by registrars. |

### Technology specific approach

* Option A: The current situation
* Option B: A ‘technology neutral’ approach to policy drafting replaces the current prescriptive approach

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| 37. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
|  |
| 38. | Which of these options do you prefer? Why? |
| A. This is a tricky one. My instincts tend to support option B, except that where there is no list of suitable technologies, registrars may engage in unethical practices and hide behind their decision by claiming it is “more secure”. As an example current policies require that UDAIs are only valid for 30 days, before this came into effect I encountered a registrar that decided it would quietly change them every time a domain name was renewed or altered thus invalidating a registrant’s list of domains and UDAIs. This means that in the event of a dispute and registrant they could place barriers in the registrant’s attempt to move their domain to a different registrar. Yes, I am aware that even in the event of a dispute they would be required to generate and supply UDAIs, but how many other registrants would? |

## Conflicted domain names

### Self-conflicted names continue to be unresolved

* Option A: The current situation - the Registry continues to allow self
* Option B: Provide a deadline for the registrant to resolve the conflict themselves to avoid release of domain names.

### Other conflicted names continue to be unresolved

* Option A: The current situation
* Option B: Provide a deadline for all registrants to come to an agreement
* Option C: InternetNZ develops a criteria for prioritising registrants’ right to a .nz name

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| 39. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 40. | Which of these options do you prefer? Why? |
| For self conflicted domains A. Enough time has gone by they should either pay the $20 / year to register the name or let someone else have it.For other conflicted names C. I would prefer that the chosen option was 1. the earlier or earliest registration.Another option is to make the conflicted name a moderated 2ld. I believe this was one of the original options when registrations at the second level was introduced. |

## Enhancing privacy across the .nz domain name system

### Level of registrant data collected and stored

* Option A: The current situation
* Option B: Introduce different registrant profiles, requiring different levels of contact data to be collected for each.

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| 41. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 42. | Which of these options do you prefer? Why? |
| A. But see my comment on question 43 |

### Registrant data is made public by default

* Option A: Current situation
* Option B: The IRPO is opt out, i.e, individual registrants have the option activated by default
* Option C: All registrant contact details are withheld from query services for all individuals not in trade (no option to opt out or in)

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| 43. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| “Principle 1 [Of the Privacy Act] states that organisations must only collect personal information if it is for a lawful purpose connected with their functions or activities, and the information is necessary for that purpose.When asking people for their personal information, you should carefully consider why you are collecting it. If the personal information you are asking for isn’t necessary to achieve something closely linked to your organisation’s activities, you shouldn’t collect it.” -- Office of the Privacy Commissioner <https://privacy.org.nz/the-privacy-act-and-codes/privacy-principles/purpose-for-collection-of-personal-information-principle-1/>Before considering what information needs to be made public, you should investigate the information being collected and why you need it. For example, presumably the technical contact is to allow urgent communication with the person responsible for the domain name’s DNS if it is causing problems, which I would assume would be by phone or email. Given this, why do you need to know their snailmail or physical address?Equally, where there is an administrative contact, what is the rationale for also needing contact information for the registrant?Individual registrants being given automatic IRPO makes the assumption that most individual registrants are not going to be engaged in business or political activity through the website. Has any study been done to indicate that this is true? |
| 44. | Which option do you prefer? Why? |
| A. Registrars should be required to prominently display the opt in option on the registration form. |
| 45. | Under the IRPO, which contact details do you think should be withheld from WHOIS? |
| All except a working email address which does not need to be the actual final email address if Internet NZ wants to maintain a mail forwarding service. |

### Implementation of the IRPO and access to registrant information when required

* Option A: The current situation
* Option B: Streamline the process described in clause 22 of the *Operations and Procedures* policy and make it more user friendly for requests to access ‘Withheld Data’
* Option C: The creation of a form that allows people to communicate with a registrant without requiring the registrant’s email address

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| 46. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 47. | Which option do you prefer? Why? |
| Option A. If its intent is to protect people’s addresses it seems to be working. |

## The .nz domain space and Māori

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

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| 48. | Do you agree that following the Panel’s work, InternetNZ should take reasonable steps to engage with Māori when amending the .nz policies? Why / why not? |
| Yes. In administering the .NZ name space on behalf of all of New Zealand InternetNZ should act in accordance with the treaty partnership. |

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

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| 49. | Do you agree InternetNZ should ensure it has adequate capability to facilitate engagement with Māori? Why / why not? |
| Yes. In administering the .NZ name space on behalf of all of New Zealand InternetNZ should act in accordance with the treaty partnership. |

### Engaging with Māori on the issues that the Panel has identified

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| 50. | Are there any other .nz-related issues affecting Māori that you think should be considered? |
| Unknown. As a surrogate for New Zealand society, our treaty obligations need to be met by the administration of .nz. I don’t have sufficient knowledge in this area to have any useful input. You’ve already considered a number of issues I didn’t know existed before reading your paper. |

## Opportunities to enhance .nz growth and improve market operation

## The current flat wholesale fee structure limits innovation

* Option A: Flat wholesale fee, no rebates or incentives (Current situation)
* Option B: Enable variable wholesale pricing to Registrars
* Option C: Allow Registry to offer rebates to the registrant via the wholesale fee

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| 51. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 52. | Which of these options do you prefer? Why? |
| A. The other options seem complicated & there is no guarantee that registrars would pass the discounts on to the registrants. |

## The scope of incentives to enhance market operation

* Option A: Do not incentivise registrars or registrants (the current situation)
* Option B: Allow registrar incentives to drive specific initiatives
* Option C: Require any incentive payment criteria to be designed to promote .nz policy goals

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| 53. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 54. | Which of these options do you prefer? Why? |
| A. The other options seem complicated & there is no guarantee that registrars would pass the discounts on to the registrants. |

### Empowering registrants could improve market performance

* Option A: Current situation
* Option B: InternetNZ works with registrars to establish a statement of registrant rights which the DNC monitors and registrars are accountable for by annual monitoring

#### Option C: DNCL publishes expanded objective market information to better inform registrant choice eg. market share and renewal rates

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| 55. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| I feel there should be an option D: DNCL establishes a statement of registrants rights which is emailed to each unique registrant on initial registration and annually thereafter. Please note, **unique registrant** so people with a large number of domain names aren’t massively spammed.I also don’t believe that option C is mutually exclusive with any of the other options & would like to see it implemented regardless. |
| 56. | Which of these options do you prefer? Why? |
| D & C. See answer to 55. If D is not an option, then A & C. |

### Improving the regulation of Resellers could enhance market operation

* Option A: The current situation
* Option B: Establish a two-tier registrar system which incorporates resellers
* Option C: Reduce the $3,000+GST registrar establishment fee for existing resellers as part of the proposed two-tier registrar system

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| 57. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| There is already a requirement section 3.15 of Roles And Responsibilities “Be responsible for all actions of any person or organisation acting as a reseller through the authorised registrar. Resellers are required to meet the same obligations and standards as registrars in their dealings with domain names and registrants.” [https://www.dnc.org.nz/content//roles\_and\_responsibilities\_2.2.pdf](https://www.dnc.org.nz/content/roles_and_responsibilities_2.2.pdf) i.e. registrars are responsible for ensuring that DNCL policies are implemented for domain name registrations for which they are the registrar of record. If registrars choose to permit resellers they are responsible for the activities of the reseller and need to ensure that the DNCL policies are implemented. There are guides and sample contracts they can use to ensure that resellers act appropriately.<https://www.dnc.org.nz/registrars/resellers><https://www.dnc.org.nz/sites/default/files/2016-02/Final_Reseller.pdf><https://dnc.org.nz/node/1634>Option A and the preamble seems to say, without evidence, that this is not happening. “The Panel believes the overall lack of regulation of resellers creates an inability to hold them to account for inappropriate or harmful activities. This situation creates frustration for registrars, registrants and the registry.” Perhaps we should have an Option A+ which is option A with the addition that existing policies are enforced by the registrars and DNCL. |
| 58. | Which of these options do you prefer? Why? |
| A+ as described in my answer to 57. Technically I am a reseller. I manage a single domain name for a friend who just uses it for email & my wife’s business domain names. I also act as webmaster for my wife’s websites which are hosted on a virtual server rented in my name. Even a fee far lower than the proposed $3000 establishment fee would make it uneconomic for me to continue carrying out these activities. For my wife’s domain names it would be nuisance value, I would be looking over her shoulder saying click here … now, here … now type this ... For my friend this wouldn’t necessarily be as easy and there exists a real possibility that she might lose access to her domain for a period of time.The most severe case I can remember was when a server that was acting as the host, including DNS for our domains died and I needed to move all the domains to a new server from the same hosting company but with new IP addresses. A lot of domains needed their DNS or DNS glue records set. As I had full technical control I could contact them by alternate means letting them know that email would be restored within x hours and websites progressively over y days and just do ithad I not had this control the process would have been much longer and slower. I can’t remember exactly when this was but I think at that point I was also managing registrations for personal domain names of 3 additional family members.I would imagine that a large number of technically competent people manage a domain or two for friends or relatives.Any attempt to make low-level “technical” reselling more difficult to use would have the potential to lower the reliability and possibly integrity of .nzI strongly suggest that any attempt to require a formal registration of resellers would need to have a reasonably high number of customers and/or domains being cared for. |

## The Registry’s role in market activity

* Option A: No requirement on scope of registrar offering. Registry may not sell/market directly to customers (The current situation)
* Option B: The Registry defines minimum service/feature set all registrars must provide. The Registry may not sell/market directly to registrants. The Registry incentivises registrars to provide services it provides under agreed rules
* Option C: No requirement on scope of registrar offering. The Registry may sell/market directly to registrants under strict controls.

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| 59. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes, but if there were a differentiation between core registration services & add-ons it could be useful to expand the options.I am concerned by the “registry lock” option. IIRC this is not a part of the current .nz offerings & if implemented it could be used by a rogue registrar to block transfer of domains to another registrar by a disgruntled registrant. |
| 60. | Which of these options do you prefer? Why? |
| B. I believe all registrars should offer DNSSEC and IPv6 glue records. DNCL should mandate this.I have no problems with DNCL offering paid options other than core registration and DNS security and selection functions directly to end users. One useful option would be a service that monitors and reports on any change to the registration record. |

### Improving Registrar monitoring may enhance market operation

* Option A: The current situation
* Option B: Establish a Registrar Service Level Agreement System to enhance market operation.

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| 61. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Qualified yes. I would like more detail on what is being measured. |
| 62. | Which of these options do you prefer? Why? |
| Qualified option B, see answer to 61. |

### Greater industry data collection and publication could improve growth opportunities

* Option A: The current situation
* Option B: The Registry collects and communicates market information including customer segments, activity/utilisation and product use for industry to better understand and develop the .nz market

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| 63. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes but how customer segments and product use would be determined for existing registrations eludes me. |
| 64. | Which of these options do you prefer? Why? |
| B. Why not? Accessible information is always nice to have and sometimes useful. |

### Second level (2LD) market opportunities

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| 65. | Do you agree with our assessment of the issue? Why / why not? |
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| 66. | Is there a role for additional second level domain names (moderated or not) within the .nz domain? If so, what domains in which area? |
| I believe the horse is well and truly bolted on this. All the good names except com.nz are either registered or conflicted. To create a new 2ld you’d need to negotiate the purchase of the existing name from the current registrant(s). Forcibly acquiring registered names to create moderated 2lds would severely undermine the principle that “.nz be a domain space people trust and feel safe using”FWIW: ltd.nz, inc.nz, charity.nz for registered companies, incorporated societies and registered charities would have been nice but these names are gone. Com.nz is currently restricted, it could be made available for registered companies with matching names similar to .com.au |

## Other comments

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| 67. | Any other comments you would like to make. |
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