

10 June 2024

InternetNZ

By Email: dotnzreview@internetcz.net.nz

Submission on .nz Rules changes consultation - June 2024

The Domain Name Commission (DNC) supports the proposed changes to the .nz Rules notified in May 2024 for the following reasons:

1. **Interpretation section and definition of ‘Domain Name Holder’:** the proposed amendment provides clarity that the domain name holder is the person or entity named in the registrant field of the .nz Register. The issue appears to have arisen due to the terminology being changed from registrant to domain name holder in the .nz Rules but the relevant field in the .nz Register was not changed for consistency.
2. **Clause 6.2.3 - privacy option:** the proposed change provides clarity that if a domain name holder elects to opt into the privacy option, a registrar must only instruct InternetNZ to apply the privacy option IF a domain name holder meets the eligibility criteria.
3. **Clause 8.2.6 - operational rules:** The proposed change removes unnecessary duplication.
4. **Clause 10.3.1 (i) - information management:** The proposed changes provide clarity of naming conventions. As per 1. Above, terminology has changed in the .nz Rules from registrant to domain name holder.
5. **Clause 11.2.5 - removing authorisation:** The proposed change amends a typo.
6. **Clause 12.2.4 - investigation of enquiries:** The proposed change is required to enable the DNC to effectively carry out its role. It is essential to have the ability to request information where the DNC considers a *likely* breach has occurred in

7. order to undertake an investigation or enquiry. Rarely is all relevant information available to determine a breach has occurred.
8. **Clause 12.2.17 - enforcement actions:** The proposed change is required to enable the DNC to effectively carry out its role and to facilitate procedural fairness to parties using the dispute resolution service.
9. **Schedule 3:** The proposed change provides clarity of referencing.

Yours sincerely



Barbara Pearse

Domain Name Commissioner
Domain Name Commission