



July 2020

# Re-imagining the future of .nz

Submission template.

# How to use this submission template

## Instructions

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. A plain text summary of questions without the table formatting is attached on page 26.

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](mailto: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	Gavin Gibson
Email address	
Contact phone number	

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## 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?
	<p>Yes</p> <p>The fact that the existing .nz guiding principles capture part (but not all) of the key principals covering the various levels of domain name management results in a less than transparent situation for the stakeholders across each.</p> <p>We particularly relate to the visionary component as vision and forward thinking has been lacking broadly across the domain landscape in the past.</p> <p>Instructive, and by association guiding, is key to encapsulate all of the of the principles and create a journey which stakeholders can travel to drive the deeper understandings required respective to their position.</p>
2.	Do you think the .nz policies should be rewritten and simplified? Why / why not? If yes, how?
	<p>Similarly, to the guiding principles, policies have typically remained in a bit of an older world of communication and understanding, particularly in the sense of “legalese”. Historically and broadly across other spaces the focus has been more around the legalities, indemnity and protections in place to achieve the goals and</p>

	<p>objectives of the space. These are important but it has resulted in a situation where they are difficult to consume for the average stakeholder which leads to poor understanding, poor perception and ultimately poor execution as the stakeholder hasn't understood their obligations in the first place.</p>
3.	<p>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?</p>
	<p>Yes</p> <p>As stated in earlier feedback it is important that the principals set the guidance of what to expect further down the journey whether that is relative to process, management, policy or any other matters or initiatives which may be exposed to the stakeholders.</p> <p>The formulation could be a little more visionary, it speaks to what the domain space "should" become but doesn't quite hit hard enough about what it wants to become. It is a pretty soft statement as it stands.</p>
4.	<p>What would be the main benefits and disadvantages of moving from a 'no concern for use' approach to a 'secure, trusted and safe' approach?</p>
	<p>For a start this is a bit misleading, particularly in todays world there is plenty of concern for use. There aren't any notable disadvantages to this.</p> <p>A more inclusive approach is certainly more palatable as noted below.</p>
5.	<p>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?</p>
	<p>This is a more visionary principle, particularly in contrast to the above. One could argue that the "secure" and "safe" considerations could be rolled into the content of this principal however that would likely diminish the focus on security and safety within the space.</p> <p>The formation of this principle as proposed is supported.</p>

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?
	It is debatable as to whether this is a bit polarizing or not. It is certainly worthwhile containing content relative to the overall vision of New Zealand's approach to Digital Transformation however, as it stands this principle does depict a level of pigeon holing the space and doesn't quite speak to the significant ground that New Zealanders have made through innovation and forward thinking that has taken them to the global stage.
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?
	Yes. This is clearly an important matter for the people of New Zealand (at all levels). Calling this out and enabling this to drive the variety of initiatives both within and related to the sector will only result in good things.
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?
	Yes. This is the most exciting of the proposed principles as it speaks to the inclusive nature of driving growth and innovation. This is far more valuable than the "NZ benefit" principle proposed.
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?

	Broadly yes. As stated in previous feedback it would be beneficial to have the guiding principals lead into the policy and process matters and not attempt to summarise or define them. Whether the secondary component is considered to be the operational guidelines is debatable
10.	Do you agree that the 'rule of law' principle should not be retained as an operational guideline? Why / why not?
	We feel it is important to maintain some reference to the application of laws and that the domain space is not entirely a free space. Perhaps this element can be more clearly encapsulated into the other operational principles as we agree its current form is not appropriate.
11.	Do you think the 'first come first served' principle should be modified and retained as an operational guideline? Why / why not?
	We support the proposed new wording for the principle as we agree the prior incarnation was not optimal
12.	Do you think the 'registrants' rights come first principle should be modified and retained as an operational guideline? Why / why not?
	We agree with the panels recommendation to remove the principle and have the highlights noted within the more holistic set of principles
13.	Do you agree that the 'low barriers to entry' principle should be removed? Why / why not?
	We support the panel's recommendation to remove the principle. Whilst we actively support the promotion of a healthy and competitive landscape we would be concerned, as the Panel have noted, with the future state of security and reliability as it cannot be achieved in this day of age with an environment that considers "low barriers to entry". It is also a vastly different market than it used to be and entrants without sufficient capabilities around technology, resources,

	budgets, etc. add little to the competitive environment but there are plenty of potential entrants with those capabilities in addition to security and stability.
14.	Do you agree that the ‘no concern for use’ principle should be modified and retained as an operational guideline? Why / why not?
	As noted earlier there are issues with the principle as it stands. We agree that the panels recommendation better suits the purpose. Again, arguable as to whether this needs to be retained or encapsulated into other principals but it is an important call out particularly in an environment where further digital adoption is bottlenecked by the perception of complexity and difficulty.
15.	Do you agree that the ‘structural separation’ principle should be retained as an operational guideline? Why / why not?
	Wholeheartedly agree with the panel’s recommendations.
16.	Do you agree that the ‘clear chain of relationships’ principle should be retained as an operational guideline? Why / why not?
	We agree with the panel’s recommendations. In line with other comments, a more transparent and easier to understand environment benefits all stakeholders.
17.	Should the Panel consider any other principles?
	The revised set of principles create a clear and well rounded divide of the stated goals. At an operational level there could be some consideration around ease of access, utilisation, application of process and policy to clearly place obligations on registrars (and the registry for arguments sake) to ensure that the space is as frictionless as possible. Whilst we are mostly good actors it is not complete. This would back off the “open and accessible” guiding principle and give substance behind it at that operational level.

18.	Is there anything else the Panel should bear in mind when making recommendations on the principles or operational guidelines for the .nz policies?
	Not beyond what has already been mentioned or considered. It is pleasing to see this level of engagement and collaboration to shape the future of the space.

## 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

19.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes, they encompass the primary considerations. It would be nice to have some sense of measure the gravity of this as a real world problem vs something that may have just been raised by the panel (or others not necessarily at the coal face). As a multi-regional organisation we can't say we have seen any material concerns relative to the language of the .NZ policies.
20.	Which option do you prefer? Why?
	As stated above without a measure it is challenging to comment as to a preferred option. As a result, and by default, Option A resonates. Particularly these days where in browser translation, whilst not perfect, is pretty reasonable for such purposes. Option B addresses a subset of the "problem" and achieves a positive step relative to the stated cause but leaves a substantial portion untouched. Option C would quickly become a logistical challenge to implement and maintain. Which languages do you cover?

## 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

21.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Again, without a measure it is really challenging to comment as to whether there is a positive return (engagement, perception or otherwise). However the options have otherwise been sufficiently covered.
22.	Which option do you prefer? Why?
	Similar to the policies question it is challenging and preference falls to the current state option. However, building a roadmap to support IDNs within standards being applied by other regional registrars would be welcomed.

## 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

22.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Broadly yes. One could argue for an option which considers “regional” eligibility (e.g. Australia, Pacific Islands, etc).

23.	Which option do you prefer? Why?
	<p>Broadly we prefer option A and the current state. In our view, although there are a small subset of bad actors this would stifle the more free and innovative reputation which the space holds. Bad actors will always find a way to achieve their motives so we don't foresee that such restrictions would necessary mitigate the risk. This also goes against the principles to some degree.</p> <p>We believe that the security and stability (both operationally and reputationally) concerns can be managed through clearer structure around the space which is being built as well as through greater collaboration amongst the stakeholders to abide by that structure.</p>

## 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

25.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes
26.	Which of these options do you prefer? Why?
	<p>Option D</p> <p>As stated previously, we don't believe the "no concern for use" principle is accurate and there should be a state of concern for use.</p>

We would have concerns with the trusted notifier scheme particularly echoing the concerns around dependency on the agencies. Typically we have seen a lot of confusion and misunderstanding within certain agencies which has been more challenging to manage than regular abuse complaints.

As a registrar (and as many others do), we operate an acceptable use policy which whilst moderately resource intensive is manageable. Avoidance of the subject will only result in continued abuse so it would be more beneficial to stand behind. A unified approach with a clear channel between the stakeholders would be most beneficial.

Further to that, there is an increasing set of affordable technological capabilities within the market that could assist with such endeavours.

### 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

27.	Do you agree with our assessment of the options? Why / why not?
	Yes, although a further option is to build on the above with respect to acceptable use.
28.	Which of these options do you prefer? Why?
	Option C but in line with “acceptable use” to broadly encompass illegal activities (or the “promotion” thereof). We understand there is broad consensus within the industry to protect the space, but the broader online world from these type of matters.

### 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

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?
	<p>Our experience across other spaces and generally within the industry is that while Options B and C do mitigate the concerns and issues to some degree, it doesn't resolve the matter and in some instances causes more pain and concern than it solves. Bad actors will find a way if they are motivated enough. Option C in particular will be a challenge to maintain and creates a dichotomy which doesn't align with the principals or direction of .nz.</p> <p>Again, a more unified and streamlined approach for all stakeholders would be a better focus.</p>

### 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

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?
	As a registrar which does not support domain tasting we could live with Option B. However we believe this would only serve to damage the experience of good actors (mistakenly registering a domain name with a typo or misspelling for example).

**Misleading, deceptive, and offensive domain names**

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

33.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes
34.	Which of these options do you prefer? Why?
	Option A. We do not support the implementation and maintenance of reserved and restricted names lists. It is a challenge to maintain and doesn’t necessarily solve the problem as noted within other spaces.

**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

35.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes
36.	Which option do you prefer? Why?
	For us, Option B or C would be palatable. However I can certainly see that option C would have greater impact to maintain a competitive environment whilst achieving the other goals and principles stated so we could easily support that option.

### Technology specific approach

- Option A: The current situation
- Option B: A 'technology neutral' approach to policy drafting replaces the current prescriptive approach

37.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes, although there is arguably something in between option A and B. Perhaps something that has its separate set of guidelines and expectations which can be adapted as technology continues to advance.
38.	Which of these options do you prefer? Why?
	Broadly Option B but as stated above there could be tackled a little bit differently. I believe it would be worth opening that up as a separate workstream.

## 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

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?
	Option B for self-conflicted domain names. Option A for other conflicted. We don't believe there should be favoring or priority of rights, particularly at this stage with arguably retrospective action.

## 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.

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?
	Option A. We don't believe the additional complexity would benefit any stakeholders to any great capacity and it would be challenging to manage.

### 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)

43.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes
44.	Which option do you prefer? Why?

	Option B best benefits the interests of registrants.
45.	Under the IRPO, which contact details do you think should be withheld from WHOIS?
	Name, Address, Phone Number

### 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

46.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Broadly yes. Arguable as to whether you could set up a forwarding service to allow easier use and contact, such as <a href="mailto:domainname.nz@irpo.org.nz">domainname.nz@irpo.org.nz</a> or similar. Obviously, this would come with technological burden and open to potential abuse but could serve a purpose of notifying when email addresses on file no longer resolve.
47.	Which option do you prefer? Why?
	Option C. Easier and simpler process. Yes it is open to abuse however I don't believe that is unique and it can be mitigated through a range of technologies.

## The .nz domain space and Māori

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

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, absolutely. Arguable that InternetNZ would be doing itself and its mission a disservice by not doing so.

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

49.	Do you agree InternetNZ should ensure it has adequate capability to facilitate engagement with Māori? Why / why not?
	Yes. Otherwise it serves as a potential distraction from the other goals and objectives of InternetNZ and/or diminishes the level of focus across each of the items, Māori engagement included.

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

50.	Are there any other .nz-related issues affecting Māori that you think should be considered?
	Not which we could currently highlight

## 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

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?
	<p>Option C</p> <p>We don't believe that there is any sizeable call to make any substantial changes to wholesale fee structures. However we see a lot of benefit in working with the registry (and general registrar) community to drive a unified message and approach in particular to support certain initiatives and engagement drives.</p>

### 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

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?

Broadly we would be in support of a little of both options B and C. There are tangible benefits to both but cannot really be run in isolation from the other in order to achieve the principles set out.

### 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

55.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes.
56.	Which of these options do you prefer? Why?
	Option B A collaborative approach between InternetNZ to both define and implement a set of standards that drive towards the goals of the industry as a whole would be an optimal result.

### 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

57.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	<p>Yes, although we don't agree explicitly with the statement  <i>"It is difficult to hold resellers accountable, and to ensure they minimise inappropriate or harmful activities."</i></p> <p>It is certainly a challenge but not material if managed with appropriate process and procedures.</p>
58.	Which of these options do you prefer? Why?
	<p>Option A</p> <p>We do not currently see any issues or concerns in managing the current scenario. Any two-tiered approach adds a significant level of complexity for all stakeholders involved to little benefit. Yes, revenues could be negatively impacted however we don't feel that is material particularly in consideration of the challenges of supporting and managing resellers as they grow and attempt to navigate between the tiers.</p>

## 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.

59.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
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	Yes
60.	Which of these options do you prefer? Why?
	<p>Option B</p> <p>We are comfortable with taking this approach, so long as within regular consultation practices. However we acknowledge it may inhibit innovation around the domain name space that may not require utilisation of certain typical services and solutions.</p>

### 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.

61.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes
62.	Which of these options do you prefer? Why?
	<p>Option B</p> <p>As noted earlier within our questions, we would support a consultative approach to build a framework which can be applied to drive consistency (along with enhanced reliability and security, etc).</p>

## 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

63.	Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
	Yes.
64.	Which of these options do you prefer? Why?
	Option B Although this would require additional investment from InternetNZ the data would ultimately create an enhanced environment to drive greater growth and retention.

## Second level (2LD) market opportunities

65.	Do you agree with our assessment of the issue? Why / why not?
	Yes
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?

We don't see much demand for the majority of second level domains within the space. Whilst they add more choice and availability if most users choose not to engage with them they don't serve a lot of purpose and arguably could add more confusion to the decision making process. That being said, most registrars recognise this and do not present them as an available choice anyway.

## Other comments

67. Any other comments you would like to make.

No

# Appendix A. Summary of 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?

### Rewriting and simplifying the policy framework

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

### Secure, trusted and safe

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?
4. What would be the main benefits and disadvantages of moving from a 'no concern for use' principle approach to a 'secure, trusted and safe' principle approach?

### Open and accessible

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?

### For the benefit of all New Zealanders

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?

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

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?

## **Enabling New Zealand to grow and develop**

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?

## **Transferring existing principles into operational guidelines**

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?

## **Rule of law**

10. Do you agree that the 'rule of law' principle should not be retained as an operational guideline? Why / why not?

## **First come first served**

11. 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**

12. Do you agree that the 'registrants' rights come first' principle should be removed? Why / why not?

## **Low barriers to entry**

13. Do you agree that the 'low barriers to entry' principle should be removed? Why / why not?

## **No concern for use**

14. Do you agree that the 'no concern for use' principle should be modified and retained as an operational guideline? Why / why not?

## **Structural separation**

15. Do you agree that the 'structural separation' principle should be retained as an operational guideline? Why / why not?

## **Clear chain of relationships**

16. Do you agree that the 'clear chain of relationships' principle should be retained as an operational guideline? Why / why not?

## **Summary of principles**

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**

19. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
20. Which option do you prefer? Why?

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

21. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
22. Which option do you prefer? Why?

### **No geographical limits on registrants**

23. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
24. Which option do you prefer? Why?

## **Security and trust**

### **Domain and website content abuse**

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?

### **The interim emergency circumstances clause**

- 27. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 28. Which option do you prefer? Why?

### **Domain name registration abuse**

- 29. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 30. Which of these options do you prefer? Why?

### **Grace periods and domain tasting**

- 31. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 32. Which option do you prefer? Why?

### **Misleading, deceptive, and offensive domain names**

- 33. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 34. Which of these options do you prefer? Why?

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

- 35. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 36. Which option do you prefer? Why?

### **Technology specific approach**

- 37. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 38. Which option do you prefer? Why?

## **Conflicted domain names**

39. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
40. Which of these options do you prefer? Why?

## **Enhancing privacy across the .nz domain name system**

### **Level of registrant data collected and stored**

41. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
42. Which option do you prefer? Why?

### **Registrant data is made public by default**

43. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
44. Which option do you prefer? Why?
45. Under the IRPO, which contact details do you think should be withheld from WHOIS?

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

46. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
47. Which option do you prefer? Why?

## **The .nz domain space and Māori**

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

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

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

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

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

50. Are there any other .nz-related issues affecting Māori that you think should be considered?

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

### **The current flat wholesale fee structure limits innovation**

51. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
52. Which option do you prefer? Why?

### **Other Registrar incentives could enhance market operation**

53. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
54. Which option do you prefer? Why?

### **Empowering registrants could improve market performance**

55. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
56. Which option do you prefer? Why?

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

57. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
58. Which option do you prefer? Why?

### **The Registry's role in market activity**

- 59. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 60. Which option do you prefer? Why?

### **Improving Registrar monitoring may enhance market operation**

- 61. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 62. Which option do you prefer? Why?

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

- 63. Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned?
- 64. Which option do you prefer? Why?

### **Second level (2LD) market opportunities**

- 65. Do you agree with our assessment of the issue? Why / why not?
- 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?