.nz Rules Consultation
October 7 – November 4, 2026

Submissions Received

October 7 to November 4

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Submission date

October 7, 2026

Submission number

1

First and last name of submitter

Michael Davison

Organisation (optional)

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1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

Support

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

Strong support

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

Support

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

No

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

Strong support

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

Do not use

4A. Do you have any comments on the minor amendments?

No

Submission date

October 7, 2026

Submission number

2

First and last name of submitter

Dustin Plunkett

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

Yes there is no mention of actual costs incurred by the org, what the actual changes will be. It sounds like this is a typical price increase for better profit for internet.nz not any kind of operational cost. It will quickly balloon as these things do, and price others completely out of being able to register domain names in NZ.

There needs to be a lot more transparency around these changes, as well as limits on how often they can occur, and have the related to actual costs associated with internetnz, not just more money for the board.

This sounds like a way to just keep increasing costs to registrars and them being treated as a money printing machine. It is detrimental to everyone involved other than those on the board at internetnz who I am positive will get nice pay increases from this.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

As long as it is completed in a timely manner

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

-

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

-

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

This should have been standard before now. There is no reason this already hasn't been done.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

I do not currently use it. Most of them are fake anyways.

4A. Do you have any comments on the minor amendments?

Submission date

October 7, 2026

Submission number

3

First and last name of submitter

Warwick Ogilvy

Organisation (optional)

Urutaunga

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

They make sense. A decreasing fee for those permanent users could be another possibility i.e. after 3yrs you pay a lesser amount to keep your domain up; after 6yrs you may a lesser amount etc.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

I do, but attached to this needs to be the caveat that the information gathered is stated and whoever holds it has a clear, voted on policy as to what is done with said information, how long it's held, who has access to it etc.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

The criteria provided is fairly clear but futher clarification would be appreciated.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

Please see above

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

I agree. This would save monies for privacy protection but more importantly, protect indvidiuals, groups and organisations (and their whanau) from stalking behaviour, harassment, persecution and physical danger.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

I use it to A) check the ownership of a site and B) assess whether it/they/them are who they claim to be. Occasionally I use it to see domain name availability.

4A. Do you have any comments on the minor amendments?

They sound good.

Submission date

October 7, 2026

Submission number

4

First and last name of submitter

William Gordon

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

I support these changes.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

I support this

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

Good idea - anything that reduces admin overhead is good!

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

Supported for privacy reasons

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

Just to find the agency name, then contact them directly

4A. Do you have any comments on the minor amendments?

No.

Submission date

October 7, 2026

Submission number

5

First and last name of submitter

Peter Sullivan

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

No

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

No

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

Fine

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

Yes Internt NZ should NOT have a policy of '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' - these are totally irrelevant to the operation of Internet NZ (which calims to be for all NZ) and can be used to silence critics of these policies.

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

It is wrong! the information should be transparent

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

Mostly for emails to see if they are known people or fishing attempts.

4A. Do you have any comments on the minor amendments?

NO

Submission date

October 7, 2026

Submission number

6

First and last name of submitter

Lance Wiggs

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

I strongly support this change as it removes the ability of members to affect the sustainability or integrity of the business. Pricing should lie with the Board, who are the representatives of members.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

I support this.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

Support.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

No comments.

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

Support, but some contact details required

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

To occasionally find owners of domains so I can contact them about their domain or website. Generally squatting or have a domain we would like to buy. To understand who website owners are and understand ultimate ownership of business or other entity.

4A. Do you have any comments on the minor amendments?

no comment

Submission date

October 13, 2026

Submission number

7

First and last name of submitter

Lucia Nogueira

Organisation (optional)

101domain

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

We would appreciate it if you could set a minimum notification period of 6 months.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

Please clarify the eligibility criteria you follow on your assessments. How do you determine who should be checked?

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

Billing: a Compliance Lock is suspended from billing, but a Protective Hold isn't. The hold is the more disruptive of the two for the customer, since the name actually stops working, yet it's the one we'd still pay for.

Cancelling held names: because the registration isn't frozen during a hold, the client could probably cancel a held name within the 5-day Registration Grace Period without being charged. That only works if we know about the hold, and the draft doesn't require anyone to tell us. Could protective holds also be suspended from billing? We would like to be included in all communication to our clients.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

Make no charge for names under a Protective Hold (mirroring the Compliance Lock rule)

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

We support it.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

Mostly to check availability, expiration dates, NS, registrar, and registrant data

4A. Do you have any comments on the minor amendments?

We want to be included in any and all communications sent by the registry to any of our clients.

Submission date

October 13, 2026

Submission number

8

First and last name of submitter

Ewen McNeill

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

Moving the wholesale price from the core .nz rules to an Appendix seems reasonable, providing the DNS registration pricing continues to operate transparently.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

Early checking of registrant details on new registrations seems valuable, even if done as a spot check. Rejecting false or "placeholder" information is best done early on.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

The proposed time period (2 weeks) seems extremely long, especially with "remain in protective hold indefinitely" included in the proposed rules. If the checking must be done while the registration is held out of the DNS, then the initial check should be done in a small number of business days (eg 2-3 business days at most), and a manual decision made to extend beyond that period in the case of obvious issues. Rather than all registrations potentially being in a "up to two weeks" queue for someone to get around to checking to permit them.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

The drafting of the rule change does not set any time limit on a decision to release the registration from protective hold. 2.2.14 says release "as soon as practically possible" which does not even impose any review time limit, and 2.2.15 says it can "remain in protective hold" (apparently indefinitely). The written rules should either set time frames, or at least refer to an

operational document that commits to (reasonable) timeframes. (As above, I believe "up to two weeks" is too long for an initial review period.)

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

I disagree with this proposal, at least in part.

In my view at least (a) name of the registrant/contact, (b) the country, and (c) the city, of the registrant and technical / administrative contacts should be displayed. This is not particularly sensitive information that needs protecting by default, and it enables those assessing the domain (including, eg, trying to figure out whether it's a legitimate business or a fake) to have some general information to verify if the domain belongs to the person they think it does (rather than a similar name elsewhere.)

That said, I do think at this point (with wide spread "domain privacy" at registrars), that withholding the street address/number by default makes sense. It's not usually necessary to confirm the identity of a registrant/contact, and it is typically the thing that registrants are most concerned about (compared with the country or even city level information).

Treating this privacy as "all or nothing" avoids finding a solution useful to everyone.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

I usually attempt whois first via TCP/43 (whois service). Because InternetNZ has previously removed almost all information from that (eg, cannot even see the registrant owner, let alone country/city), for anything more than a cursory check I am forced to use the web whois service on the DNC website to obtain the information InternetNZ chooses to withhold from the traditional whois service.

Almost all the time when I am using the DNC website to look up the whois information it is because I am attempting to confirm the identity of the owner of the domain name, to distinguish legitimate and fake domain names. As above the registrant name, city, and country are pretty much essential for distinguishing legitimate and fake identities/domains.

4A. Do you have any comments on the minor amendments?

The "minor changes" propose that InternetNZ will contact registrants "from time to time". It would be *extremely* disappointing to see InternetNZ turn that into an excuse to contact registrants more often than, eg, once a year.

The proposed 8.2.12 has no limits on how often InternetNZ can contact regisrants "from time to time", and I think it should to reduce the chance of misuse of information provided for a purpose other than InternetNZ directly contacting registrants.

(This "direct contact" from "time to time" seems a huge policy change to bury in a "minor amendment", especially with no limits -- "from time to time" could mean weekly spam from InternetNZ, with complaints answered with "we're permitted by the .nz rules to do so" :-/)

Submission date

October 13, 2026

Submission number

9

First and last name of submitter

Ben Vidulich

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

I am optimistic this will create opportunities to attract more prospective domain name holders to choose .nz domains. Hoping that the potential incentives will be attractive and fair towards both businesses and individuals.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

No. After many years working in banking, I am certain that KYC does more harm than good. Identity checks are not an obstacle for the fraud and scam industry, they're a minor source of friction that is cheaply outsourced to identity-fraud-as-a-service outfits. And AI is making it easier and cheaper bypass advanced checks including face scans, and from what I have seen at work, even video interviews.

The proposal makes no mention of who would own the identity checking process, nor any security requirements to ensure the identity data is protected or testing of security control effectiveness. For a legitimate domain name holder, KYC will likely increase the risk that they will be the victim of fraud and scams. Reflecting on several high-profile data breaches in Australia, the companies were all mandated to collect customer identity info and in the insurance sector were mandated to have strong security programs. Yet, they all lost customer PII due to weak security programs. Without amending the proposal, this would open up registrants to the same risks.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

A Protective Hold with manual review is reasonable, as long as the checks are pragmatic and effective. I suspect that a merely having a short

cooldown period on suspicious new domain registrations would do more to deter malicious uses than identity verification because a fixed time window cannot be circumvented.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

Although I don't support mandatory verification of identity or address of a registrant, perhaps those that voluntarily achieve verification could have this status acknowledged in their public WHOIS record. Businesses could similarly establish trust by providing their NZBN during registration and it would be displayed in the WHOIS record after verification.

Another point to consider is that my usual registrar has a warning for prospective .co.in domain name buyers that begins "This registry demands verifiable registrant contact information and is not kidding." Although the .nz proposal is more appropriately scoped and tends towards more transparency, the introduction of KYC casts a similarly over-authoritarian tone on the ccTLD. It could lead to similar warnings of discouragement which could impact the credibility and revenue of .nz domains.

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

I support this proposal – it reduces the risk of doxxing attacks and physical spam.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

During an investigation of a suspicious domain, it is useful to see when a domain was registered. Recent registrations are viewed with greater suspicion. Domains that haven't been updated recently are possibly abandoned and have greater risk of being taken over.

Address and phone number are never useful. Email addresses can sometimes be used to report abuse, but often the email address belongs to an unmonitored inbox.

4A. Do you have any comments on the minor amendments?

-

Submission date

October 13, 2026

Submission number

10

First and last name of submitter

James Clark

Emailed feedback:

Hi

The TLD is .nz, NZ is New Zealand. I see Aotearoa a couple of times below but not New Zealand,

this communicates a strong political alignment. It would be best if InternetNZ was politically neutral;

the country should be referred to in a balanced manner.

Regarding 10.3

Why not also exclude the phone? (and fax if that's shown, where present).

I tried to think of a random domain with zero affiliation, I thought of [redacted].nz'. Do you think [redacted] wants a call or txt from some random person/bot/scammer to his cell phone? I think not.

https://dnc.org.nz/whois/whois-lookup/?domain_name[redacted]#Form_show

Submission date

October 16, 2026

Submission number

11

First and last name of submitter

Raymond van Driel

Organisation (optional)

Enlighten Domains

Emailed feedback:

I am Raymond van Driel from Enlighten Domains, a small NZ registrar. This is my feedback after reviewing the proposed changes to the .nz rules v3.3.

1. **Protective Hold (clauses 2.2.11 to 2.2.15)**

We support the Protective Hold in principle. Verifying domains at the outset is a sensible way to keep the Register clean. We are concerned about its practical effect on Registrars: their software, the support load, and the management of domain statuses. A customer who registers a domain that then does not resolve will contact their Registrar, and the Registrar cannot help if it does not know the domain is held.

We suggest that InternetNZ require prompt notification to the Registrar, and make the hold status visible on the Register, so Registrars can update their systems and respond to customers.

2. **Privacy and public lookups (clause 10.3.1)**

We understand that only the physical address is to be withheld from public lookups and that country and other information remains visible. Many people use the country or region to judge whether they are dealing with a local, so we see this as important to retain. The draft does not define “physical address”, and a definition (i.e. which fields are impacted, when) would give Registrars and Domain Name Holders certainty about what is withheld.

We expect that removing the physical address from public lookups will lead more people to contact Registrars asking for it, because Registrar contact details remain visible. We suggest that InternetNZ and DNC provide clear public guidance, including a standard response Registrars can give, and consider the extra administrative load this creates for Registrars.
We also query the value of this change specifically for organisations (not individuals and residential addresses), given that the address for service is available in the companies or charities register anyway. It might make sense to follow their model.

3. **Base Wholesale Fee (clauses 7.1 to 7.3)**

Removing the fee amount from the Rules means it, and any rebate criteria, can change without the Policy Development Process.

We are also concerned that rebates which are “open to all Registrars” (clause 7.1.3.iii) can still be written to favour ‘particular types’ of Registrar. A criterion such as registering 10,000 or more domains a month for example, is formally open to everyone, but in practice only the largest Registrars can meet it. The same risk applies to criteria based on Registrar size, business model, location, growth rate, or any other differentiator.

We suggest two changes:

- a defined consultation step before any change to the fee or to rebate criteria.
- a requirement that rebate criteria be fair across Registrar sizes and business models, and that InternetNZ publish its reasoning for each of them, not merely that schemes be open to all.

Thank you for the opportunity to provide feedback!

Submission date

October 23, 2026

Submission number

12

First and last name of submitter

James Sullivan

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

Seems reasonable. It may be worth considering a clause where any changes to the pricing have to be reviewed and explicitly accepted by the board at a following board meeting. That can help strike a balance between flexibility and retaining a sense of oversight. However it may not be that useful as the board is likely to be aware and involved with any price changes as it is.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

Seems reasonable. Overall I support it.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

Seems reasonable if using a combination of random selection and heuristics to select the subset.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

No further feedback.

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

Seems reasonable. As people would still be able to place a request for the full details it may be worth adding a clause that the register contact will be notified for any accepted requests.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

Generally just to see if a domain is registered. Sometimes to find a contact endpoint for reporting scams or other issues.

4A. Do you have any comments on the minor amendments?

No comments.

Submission date

October 28, 2026

Submission number

13

First and last name of submitter

Maitlan Brouwer

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

No

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

Yes - so long as the process and outcomes (including timelines, notifications, actions required, impact on domain actions etc.) are clearly defined and communicated in advance to registrars.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

More details surrounding how this process will be handled are needed before we can claim to support or not support this hold.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

Is there a maximum period for which a Protective Hold may remain in place? If not, will one be introduced, or will DNC be required to lift the hold or begin a clause 12 process by a set date?

Will a minimum response period for holders be specified? Will DNC commit to a turnaround time for reviewing the information once it is received?

Does applying a Protective Hold fall within clause 8.2.18(b)? If not, what notification will the Registrar receive?

Will Registrars be notified when a hold is applied, and within what timeframe? Will the notice state the reason for the hold, the verification requested and the deadline for the holder to respond?

What will happen to a domain that fails the audit, and within said timeframe? Will the holder be told the outcome and given an opportunity to respond or have the decision reviewed?

Clause 7.2.6 provides that InternetNZ must not charge for a domain subject to a Compliance Lock. Will an equivalent apply to domains on Protective Hold? Will the 5-day Registration Grace Period (clause 7.3.2) be paused while a hold is in place?

While a domain is on Protective Hold, may it be transferred to another Registrar, cancelled by the holder or Registrar, or renewed? Clause 4.2.1 already restricts transfers during the Registration Grace Period, so clarity on how that interacts with a hold would help

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

This is a good change.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

Used to obtain technical details for a domain and/or contact information if available. RDAP has become more used.

4A. Do you have any comments on the minor amendments?

N/A

Submission date

October 28, 2026

Submission number

14

First and last name of submitter

Amokura Panoho

Organisation (optional)

Pou Tangata Iwi Leaders Group

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

Pou Tangata – Online Safety Iwi Leaders Group has no objection in principle to removing the specific wholesale fee from the .nz Rules or enabling rebates and incentives.

However, pricing decisions should support the accessibility, security and integrity of .nz. Incentives to increase registration volumes should be monitored alongside abuse and safety outcomes, so that growth does not encourage poor registration practices or weaken verification standards.

We recommend considering the affordability implications for marae, hapū, iwi and smaller kaupapa Māori organisations, and providing clear communication about pricing changes.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

Yes. Pou Tangata supports proportionate, risk-based early checking to validate registration information and verify that domain name holders meet the eligibility criteria.

Our work mapping the Māori Online Safety Ecosystem reinforces the importance of prevention alongside responding to harm. We describe this wider responsibility as Digital Guardianship: understanding what we are responsible for protecting and enabling, and the digital environment future generations will inherit.

Early checking can contribute to that responsibility. However, the selection criteria and verification processes must be fair, accessible and proportionate. Legitimate Māori registrations should not be disadvantaged

because they use te reo Māori, macrons, or organisational arrangements that differ from conventional commercial structures.

We recommend Māori participation in the design and evaluation of these safeguards.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

Pou Tangata supports Protective Hold in principle as a preventative measure for a limited, risk-selected subset of newly registered domains.

Its effectiveness should be assessed against both its ability to prevent abuse and its impact on legitimate domain name holders. Delays can disrupt communications and services, including those provided by marae and community organisations.

Implementation should therefore provide:

- Prompt notification explaining the hold and the steps needed to resolve it.
- Accessible verification options that accommodate different organisational structures.
- Clear timeframes for checking and releasing legitimate registrations.
- A timely process for reviewing disputed decisions.
- Monitoring of false positives, delays and inequitable outcomes.
- Personal information collected for verification should be limited to what is necessary and appropriately protected.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

We recommend ensuring that the provisions, supported by clear operational procedures, establish understandable grounds for placing a domain on hold, notice requirements, resolution timeframes and an accessible review process.

Transparency reporting should cover the number and proportion of registrations placed on hold, broad reasons for intervention, resolution times, registrations subsequently cleared, and review outcomes. Reporting should protect personal information and avoid disclosing operational details that would enable evasion.

InternetNZ and the Domain Name Commission should also assess whether risk indicators or verification requirements create unintended barriers for Māori. This should include consideration of te reo Māori names and

macrons, marae, hapū, iwi, informal groups and kaupapa Māori entities. Māori participation in this evaluation should be ongoing.

We encourage InternetNZ to situate Protective Hold within a broader understanding of the online-harm ecosystem. Domain infrastructure can intersect with impersonation, identity misuse and increasingly sophisticated AI-enabled deception, alongside scams, phishing and fraud.

Digital Guardianship requires clarity about the preventative responsibilities that appropriately sit with domain infrastructure providers, and the matters requiring referral or cooperation with other agencies and platforms.

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

Pou Tangata strongly supports withholding the physical addresses of domain name holders and administrative and technical contacts from public view by default.

Privacy by default is also an online-safety measure. Publicly accessible addresses can expose people to doxxing, stalking, harassment, intimidation and technology-facilitated abuse. The risks can be particularly serious where a home address is used for a community organisation or small business.

Legitimate access to necessary information should remain available through proportionate processes with appropriate authority, purpose and accountability. Routine public disclosure of physical addresses should not be the prerequisite for maintaining trust in .nz.

We encourage clear communication explaining the change and any information that will remain publicly visible.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

Pou Tangata's submission does not depend on retaining public access to physical addresses through WHOIS.

Our interest is in how domain registration information can support online safety while protecting people from additional harm. We support proportionate mechanisms through which parties with a legitimate and appropriately assessed need can obtain necessary information, without making physical addresses universally accessible.

Future reforms should consider the needs of people reporting impersonation, scams or other domain-related abuse, including clear pathways for raising concerns and obtaining assistance.

4A. Do you have any comments on the minor amendments?

We have no additional drafting comments on the minor amendments.

Across the amendments and future policy development, we encourage InternetNZ to give practical effect to its commitments concerning Māori participation and te reo Māori me ōna tikanga.

We recommend a structured mechanism for Māori participation in the continuing development, implementation and evaluation of the Domain Name Abuse Strategy and relevant .nz policies. Māori should help shape preventative approaches and safeguards from the outset.

Our overarching recommendation is that InternetNZ apply a Digital Guardianship approach to .nz: protecting people, enabling participation and innovation, and exercising accountable stewardship of infrastructure that future generations will inherit.

Please note that Rahui Papa, chair of Pou Tangata ILG is happy to speak to our submission.

Submission date

October 28, 2026

Submission number

15

First and last name of submitter

Steven Heath

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

I am strongly against this proposal. It runs counter to the approach on which .nz has been operated for more than 30 years, that all registrars are treated equally. Rebates and incentives would create tiers of registrars, and InternetNZ would be the party enabling that.

1. It contradicts InternetNZ's own principles. The TLD Principles call for equal treatment of registrars by the registry, and the .nz policy framework has long provided that the wholesale fee will be the same for all .nz domain names. How does InternetNZ reconcile the proposed .nz policy change with its own TLD principles?

2. It favours the largest registrars and raises barriers to entry. Volume or growth incentives will flow mostly to large, often offshore, registrars, leaving smaller New Zealand registrars and new entrants at a cost disadvantage unrelated to service quality.

3. It compromises the registry's neutrality. As the sole wholesale supplier of .nz, InternetNZ would be using that position to influence who succeeds in the retail market.

4. It rewards volume over registrant outcomes. Incentives tied to registrations tend to encourage speculative and bulk registrations and heavy first-year discounting, patterns associated with higher domain abuse in other TLDs.

5. Someone pays for the rebate. Rebates are funded by other registrars, registrants or InternetNZ's community funding. The wholesale fee rose from $18.00 to $22.00 on 1 July 2025, and if there is now room for rebates, the fair option is a lower fee for everyone.

6. The change needs a full policy process and justification. InternetNZ already sought views on variable pricing, rebates and incentives in the 2021 .nz policy review. It should explain what has changed since then.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

DNC already has this power. It appears this is being used as a reason or weakness of the existing .nz policy when that is not the case.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

Opposed. This is further cements more power into a a private sector organisation that is managing in effect a pubic good. To often in the last few years have internet users and those involved in InternetNZ wish to "end" a domain name as they do not like the content on the usage of the domain name. I see no controls or limits on this policy other than annual reporting after the fact.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

Yes. Remove the entire section. Failing that put in guidance on when it can be used and more regular reporting, perhaps with a 7 day delay. This can be automated by registry systems that a list on the DNC website can be generated of those names that have had Protective Hold applied. This is not the 1990's where you cant do near real time reporting of information.

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

Concept is fine but the actual wording change seems like a quick change rather than a thought out policy change. Further thought should be applied to the actual wording change rather than adding "excluding physical address".

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

In the manner it was designed, to see who the registrant or registrar is of a domain name.

4A. Do you have any comments on the minor amendments?

I think the addition of ".nz" on a number of instance of "domain name" is unnecessary. Its not like the DNC and InternetNZ can apply this policy to any other type of domain name? The document is literally called ".nz Rules".

However in 8.2.11 b i you have "i. it is permitted by these .nz Rules, or required by law" In this case "law" is not qualified. Does this mean a law from Canada would apply? Something like "Recognised Statutory Authority" (or whatever the equivalent the correct term is)

Submission date

November 4, 2026

Submission number

16

First and last name of submitter

Andrew Sullivan

Organisation (optional)

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

Do not support

Re: clause 7.1.3.ii,

This could create an unfair market and further entrench large international players while simultaneously punishing small local startups from entering the sector. The consequences of this would be to create a market driven by volume and not quality. Similar to what we see in the wholesale grocery space.

While the .nz domain does not correlate with any geographical area, the public think it does, and as such it has a perceived "good will". A rebate could create barriers to local business while encouraging the watering down of .nz credibility/security. (domain parking to get rebates)

I think this is a very slippery slope to go down, and to what end.? Is this going to create a skewed market where no-one knows where .nz is ? or in fact what value to attach to it ?

In an open and fair market you should concentrate on providing the best product rather than trying to skew the market to sell the most product.

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

support

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

support

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

support

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

I do not support the change. It is my understanding that the privacy option already allows for this.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

-

4A. Do you have any comments on the minor amendments?

-

Submission date

November 4, 2026

Submission number

17

First and last name of submitter

Lee Miller

Organisation (optional)

1st Domains Limited

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

It makes sense to move the wholesale fee to the connection agreement. We support introducing rebates and incentivised pricing to support and encourage joint Registry and Registrar initiatives to grow and increase the quality and trust of .nz

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

Yes. At registration time is the most effective time to validate registration information before any harm can be potentially happen.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

We support this, provided the threshold is finely tuned to identify most at risk domain names. Removing them from DNS will prevent any harm from occurring whilst providing an opportunity for registrants to engage with validation procedures. From a Registrar perspective, we would expect to receive automated notification of application and removal of protective hold, so that we can directly communicate with customer and update our systems for visibility of hold status. The process for allowing a Registrant to validate should be as efficient and as automated as possible to avoid further delaying the activation of domain names where the use case is legitimate.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

We consider them reasonable.

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

We support removing the physical addresses of domain name holders and contacts from the public WHOIS to protect registrants from personal safety and security risks.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

We are willing to consult and provide this information privately.

4A. Do you have any comments on the minor amendments?

We support the change to 3.3.2 for Change of Name Holder retention of records clarification supports digital processes for change of name holder.

Submission date

November 4, 2026

Submission number

18

First and last name of submitter

Alyssa Wilson

Organisation (optional)

Financial Markets Authority (FMA)

Emailed feedback:

Kia ora Isobel,

Thank you again for inviting the FMA to provide feedback on InternetNZ's consultation on the proposed changes to the .nz Rules, and for the opportunity to engage with InternetNZ on the Domain Name Abuse Strategy.

Following our review of the consultation, the FMA has prepared feedback on the proposed .nz Rules, focusing on the Protective Hold provisions and domain name holder information.

Our feedback is set out below.

Support of proposed changes to the .nz Rules

The Financial Markets Authority (FMA) has no comments on the proposed wholesale fees and no objections to the proposed changes relating to WHOIS details, including withholding from public view address information.

The FMA supports the intent of the Protective Hold provisions and the broader Domain Name Abuse Strategy as preventative measures to help address the misuse of .nz domain names for scams, phishing and other potentially harmful digital activity.

Consultation feedback

In alignment with the Consultation document 2C of feedback on the proposed drafting of the Protective Hold provisions, the FMA supports the introduction of Protective Hold provisions and the annual publication of its

use. However, we have concerns that the 14-day limitation for newly registered domain names may impact the efficacy of the provisions.

Under the proposed provisions, a Protective Hold can only be initiated on domain names that are less than 14 days old. Through perimeter regulatory work, the FMA encounters domains where indicators of malicious behavior only become apparent later in the domain's lifecycle. For example, a domain may be registered and remain dormant or appear legitimate for a period before being used to publish scam-related content. In these circumstances, the relevant warning signs may not emerge until after the proposed 14-day period has expired.

This raises a potential issue with the effectiveness of the Protective Hold mechanism in these circumstances. By the time sufficient indicators of potential scam or phishing activity become apparent, the domain may no longer meet the definition of a newly registered domain name and would fall outside the scope of the Protective Hold provisions.

The FMA considers that taking account of international trends and developments in domain-based scams activity could also help ensure the Protective Hold model remains responsive and future-focused as scam practices evolve. We would be available to discuss this further and provide further information on the types of domain-related behaviors and trends we have observed, if useful.

WHOIS information

In relation to WHOIS information under 3A of the Consultation document, the FMA supports address information being withheld from public access. However, we suggest a process is implemented in which this information can be requested and disclosed promptly to relevant agencies including the FMA. The FMA regularly use WHOIS information when assessing matters and as a source for confirming contact and identifying information for New Zealand-based persons. We would like to ensure this information remains available to appropriate law enforcement agencies, when requested for a valid purpose.

We appreciate the opportunity to contribute to this work and would be happy to discuss our feedback further, including the types of domain-related behaviours and trends we observe through our regulatory work, if useful.

Ngā mihi nui

Alyssa

4 November 2026

Internet New Zealand

By Email: dotnzreview@internetnz.net.nz

Tēnā koe

Subject: 2026 .nz Rules Consultation - Domain Name Commission Submission

RE: .nz Rules Consultation - Domain Name Commission Submission

The Domain Name Commission (DNC) has been appointed by InternetNZ (INZ) to manage aspects of the .nz Domain Name Space on behalf of InternetNZ. In particular, the Oversight Services as set out in the Operating Agreement dated 28 August 2026. The Oversight Services include to:

- *provide expert advice in relation to .nz Rules, policies, reports...; and*
- *provide such support as reasonably required by InternetNZ to enable the .nz Rules or relevant policies to be developed or modified.*

DNC makes this submission in accordance with that mandate and with a risk and compliance lens.

1A. Do you have any comment on the new wholesale fee, rebates and incentives approach we are introducing?

The decision to remove the wholesale fee from the .nz Rules
While DNC acknowledges that removing the wholesale fee from the .nz Rules aims to make wholesale fee changes more efficient, it will be vital to ensure any subsequent changes to the wholesale fee are publicly available including the effective date for transparency.

The consultation document notes that *"the wholesale fee will continue to be documented in agreements InternetNZ holds with registrars"* and that the *"Base Wholesale Fee will continue to be included in Schedule A: Charges of the Registrar .nz Connection Agreement."* Proposed Clause 7.1.2 notes that the INZ *will publish the Base Wholesale Fee.* The proposed .nz rule itself is currently silent about where it will be published.

Currently the InternetNZ Board approves changes to the .nz Rules pursuant to the Policy Development Process in Schedule 1 of the .nz Rules. Removing the Wholesale Fee from the .nz Rules, means the Policy Development Process is no longer undertaken. INZ notes in the Consultation document "*Taking the specific*

wholesale fee out of the .nz Rules allows for Board approval to be sought via annual budget processes instead of a .nz Rules change"

DNC recommends the following safeguards:

- **Mandatory Publication of the Wholesale Fee on InternetNZ's website:** The Base Wholesale Fee (the proposed replacement term) including any changes made to it, should be publicly accessible to all stakeholders, along with the effective date.

- INZ has previously published details about changes to the wholesale fee on the news section of the INZ website. The consultation document does not confirm whether this practice will continue. Our view is this is a useful location to publish any Base Wholesale Fee change for transparency and to ensure that it is easily accessible in addition to INZ's proposal to include it in the Connection Agreement.

DNC recommends amending proposed clause 7.1.2:
To add the words underlined to the end of Clause 7.1.2 :

> *"..and will publish the Base Wholesale Fee, including any changes to it, on the InternetNZ website."*

The decision to add rebates and incentives
DNC supports incentives and rebates that drive growth in the .nz domain space in theory, provided that the integrity of the .nz register is maintained and they are quality registrations (eg: likely to renew, contain accurate and complete registration information and are not malicious registrations).

The consultation document is silent on the proposed or likely assessment criteria a registrar might need to meet to be eligible for an incentive or rebate. DNC accepts this would also change over time. DNC would recommend that when INZ develop any assessment criteria they include at least one or more compliance, security or registration quality guardrails in the eligibility criteria to qualify for a rebate or incentive. DNC offers the following comments for INZ's consideration:

- **Publication of Criteria:** The consultation document notes that the eligibility criteria for rebates and incentives will be *'published openly'*. We strongly support this to ensure market transparency and an opportunity is provided for all registrars to participate.
  DNC recommends that the .nz Rules expressly states the rebates and incentives framework will be published on INZ's website and may be updated from time to time.

- **Balanced Assessment Criteria (Quality vs. Volume):** DNC would be concerned if a purely volume-based incentive model was implemented by INZ and there were no guardrails around ensuring those were quality registrations.DNC has observed an increase this year in the number of

domain names failing audits due to incorrect domain name holder registration information or domain name holders not verifying their identity.

Eligibility should incorporate an objective quality assurance or compliance metric, such as:

- Less than 1% of the registrar's newly registered domain names audited by DNC are suspended for failing the audits during the relevant period.

DNC recommends proposed clause 7.1.3 iii is amended with the addition of the words underlined as follows: :

"All rebates and incentives schemes will be open to all Registrars and will be published by InternetNZ. The criteria for rebates and incentives will be published on the InternetNZ website and may be updated from time to time."

2A. Do you support early checking of some newly-registered domain name registrations to validate the registration information and verify the identity of the domain name holder to ensure they meet the eligibility criteria?

DNC supports this.

2B. What is your view on applying a Protective Hold to a subset of newly-registered domain name registrations so that they can be checked?

DNC supports this.

2C. Do you have any feedback on the proposed drafting of the Protective Hold provisions?

DNC supports the inclusion of the Protective Hold clauses**.** However, InternetNZ (INZ) should clarify in the .nz Rules whether a domain name holder will be charged while a Protective Hold is applied.

We note for INZ's consideration that the majority of domain names that DNC audits fail. In Q2 FY26/27 (1 July – 30 September), DNC audited 1,131 domain names, resulting in 959 suspensions (85%) for non-compliance with the .nz rules. We expect a similar proportion of domain names selected for audit if Protective Hold is implemented will fail their audit due to non-compliance with the .nz rules which is largely due to the risk based approach taken to identify the sample for auditing. We expect a similar proportion of domain names placed in protective hold will likely continue to pass the audit process (15%).

3A. What is your view on the proposal to stop publicly displaying physical addresses of domain name holders and the technical and administrative contacts in the WHOIS Lookup information?

DNC supports this proposal.

3B. Please advise how you currently use the WHOIS Lookup. This will assist us in scoping any future reforms.

DNC uses the WHOIS Lookup database to find the domain name holder contact information and identify who the registrar is among other things.

4A. Do you have any comments on the minor amendments?

DNC supports the minor amendments being made to provide clarity.

Ngā mihi,

Barbara Pearse
Domain Name Commissioner