.nz Policy Review

February 2021

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Part A: Introduction

Who are we?

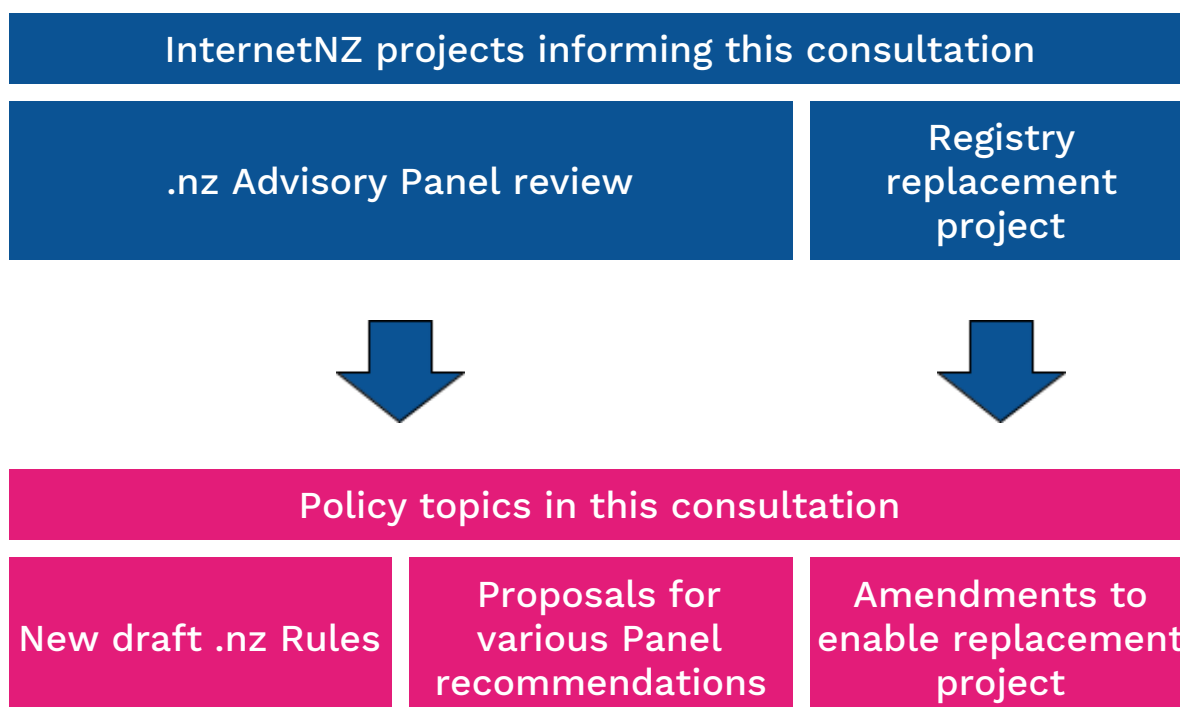InternetNZ is responsible for managing the .nz domain name space.

The .nz domain name space is the country code top level domain (ccTLD) assigned to Aotearoa New Zealand. It represents us on the Internet and is managed for the benefit of us all.

We are the home and guardian of .nz - providing the infrastructure, security and support to keep it humming. You can find out more about us here: About InternetNZ » InternetNZ.

What does this document seek feedback on?

We seek your feedback on:

- our draft rewrite of the .nz policies (the **draft .nz Rules**)
- our proposed method for implementing some of the recommendations made to us by the .nz Advisory Panel (see below).
- some proposed policy changes to support the development of a new registry for .nz.

InternetNZ projects informing this consultation	
.nz Advisory Panel review	Registry replacement project

Policy topics in this consultation		
New draft .nz Rules	Proposals for various Panel recommendations	Amendments to enable replacement project

Draft .nz Rules

The .nz Advisory Panel recommended a complete overhaul and rewrite of the .nz policies (**recommendations 2-4**). It proposed a new approach that was simpler, easier to navigate, and more user-friendly.

We have prepared the draft .nz Rules in response to their recommendation. We are using the term '.nz Rules' instead of policies because much of the content is more akin to rules than policy.

We want your feedback on form and substance

We want your help to ensure the proposed .nz Rules are fit for purpose and help us realise our vision of helping New Zealanders harness the power of the Internet.

We have sought to remove or rewrite clauses we considered redundant or unnecessary - particularly as we move to the new registry (see below). In doing so, we might have made incorrect assumptions or other mistakes that you can bring to our attention.

We have included a comparison table in **Appendix 2** to help you see what has changed from the current .nz policies. We hope this helps to inform your feedback.

These changes will not go live for some time

Our intention is to bring the draft .nz Rules into effect at the same time as the new registry goes live. This is unlikely to happen until 2022. However, the team working on the new registry needs to know what the rules will be before they go much further with that project. This is why there will be a gap between making decisions on the new rules and bringing them into force.

This also means some of our proposals have been made on the basis of how things will work when that happens, rather than how things work now.

We are likely to consult on some further changes to the draft .nz Rules before they come into effect (for example, some of the recommendations of the .nz Advisory Panel will be considered in a second tranche - see the recommendations in Category 2 in **Appendix 1**).

As well as ensuring the new registry is ready to go live before bringing the changes into effect, we will need to review the Connection Agreement, the Authorisation Agreement, and other .nz agreements to ensure they interface properly with the draft .nz Rules and the new approach and terminology.

Proposed method of implementation of some recommendations

We want your feedback on our proposed method for implementing some of the recommendations made by the .nz Advisory Panel. As well as the recommendations on the overhaul and rewrite of the .nz policies mentioned above (recommendations 2-4), we would like your feedback on:

- recommendations on the existing principles and on proposed new principles (**recommendations 1 and 6-12**)
- recommendations on the policy development process (**recommendations 5 and 13**)
- a recommendation to modify the exceptional circumstances provision and make it permanent (**recommendation 20**)
- recommendations on privacy (**recommendations 29-31**)
- recommendations on variable pricing, rebates and incentives (**recommendations 33-35**).

We have incorporated most of these recommendations into the draft .nz Rules themselves.

The draft .nz Rules do not yet include proposals for implementing the Panel's recommendations on privacy, variable pricing, rebates and incentives. However, we discuss our proposed methods for implementing these recommendations in this consultation document below.

We have not yet decided to accept these recommendations

We are seeking your views on whether the Panel's recommendations discussed in this document should be implemented - and if so, how.

Given the high-level nature of many of the Panel's recommendations, we thought it was important to show you how the .nz policies would change if we were to accept them. We hope this helps inform your views about whether each recommendation should be implemented and, if so, whether our proposed approach would be the best way to do it.

After we have received feedback from you, we will decide whether to implement each recommendation:

- as contemplated in this consultation document
- in a different way
- not at all.

We might proceed with some, none or all of the recommendations.

Policy changes to develop new .nz registry

We are also seeking feedback on some proposed policy changes to support the development and future implementation of a new registry for .nz.

These include:

- the minimum period for which a .nz domain name can be registered or renewed
- standardising the terminology.

How does this document fit into the wider .nz review process?

This consultation document is the latest step in the .nz review. The review has three main phases:

- Phase one was the .nz Advisory Panel process
- Phase two is the current phase - our response to the Panel's recommendations
- Phase three will involve implementation of any changes.

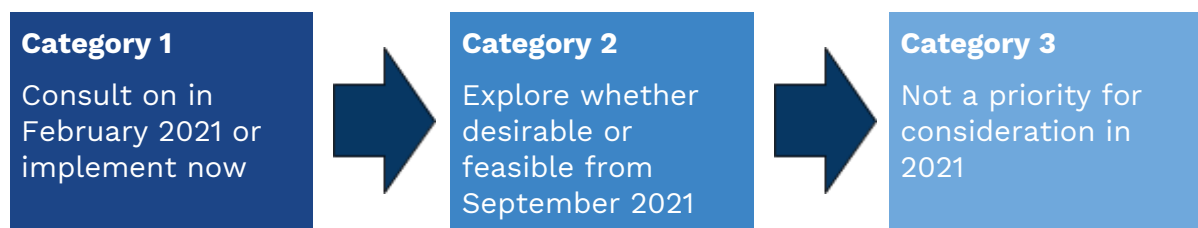## Phase one: The .nz Advisory Panel process

In 2018 we decided to undertake a review of the frameworks and policies that govern how .nz works. We wanted to ensure that .nz was fit for purpose for the future of the Internet and the future of Aotearoa New Zealand.

In July 2019 we appointed the .nz Advisory Panel. This was an external panel reflecting the diversity and expertise of a broad range of New Zealanders. The Panel ran an engagement process to develop options for the future of .nz. You can find out about the Panel and the work it did here: .nz policy review » InternetNZ.

In September 2020 the Panel gave us their final Recommendations Report, with 53 recommendations.

Phase two: InternetNZ's response to the Panel's recommendations

Since we received the Panel's Recommendations Report, we have categorised its recommendations into three groups:

Category 1
Consult on in February 2021 or implement now

Category 2
Explore whether desirable or feasible from September 2021

Category 3
Not a priority for consideration in 2021

Appendix 1 sets out which recommendations we have put into each category.

We are seeking feedback on almost all[1] of the Category 1 recommendations in this consultation document.

In September of 2021, we will start exploring whether it is desirable and feasible to implement Category 2 recommendations.

We will decide when to look at the Category 3 recommendations in 2022.

Phase three: Implementing changes to the .nz policies

Phase three will involve working with participants in the domain name system to implement any changes to the policies governing .nz.

This work is likely to happen in late 2021 and 2022.

The proposed policy changes in this consultation document, if made, would be implemented alongside the new registry system. The Category 2 recommendations may also be consulted on and implemented with the new registry system as well.

Timeline

- **2018:** InternetNZ commits to review the .nz policies
- **July 2019:** the .nz Advisory Panel began its work
- **January 2020:** the Panel releases an Issues Report, identifying a number of issues with the .nz policies
- **July 2020:** the Panel releases an Options Report, seeking feedback on potential options to address the identified issues
- **September 2020:** the Panel provides its Recommendations Report to us, providing its 53 final recommendations on proposed changes to the .nz policies
- **December 2020:** InternetNZ makes decisions on how to approach the Panel's recommendations
- **February 2021 (now):** we release this document for consultation
- **May:** first set of decisions on the new .nz rules
- **Late 2021:** consider Panel recommendations from category 2 (see below)
- **2022:** develop responses to category 3 recommendations
- **2022:** implement the decisions.

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[1] We consider we can make progress in implementing two recommendations in Category 1 now:
- recommendation 14: to ensure we have the capability to engage with Māori
- recommendation 17: to produce policy documents in an accessible format that meets web accessibility standards.

.nz and Māori

The Panel made a number of recommendations about the relationship between Māori and .nz:

- including a new principle in the draft .nz Rules that .nz should support te reo Māori and participation in .nz by Māori (recommendation 1.4)
- modifying the 'first come, first served' principle so that (among other reasons) some Māori names or words might not be made available for registration (recommendation 7)
- amending the policy development process to require us to take reasonable steps to engage with Māori when changing .nz policies (recommendation 13)
- ensuring we have the capability to engage with Māori (recommendation 14)
- engaging with Māori on specific issues the Panel identified and other issues that arise in the engagement process (recommendation 15)
- translating the .nz policies into te reo Māori (recommendation 16.

We welcome these recommendations from the Panel.

Over the course of this year, we will be engaging with Māori about our management of the .nz ccTLD. This will give us an opportunity to discuss issues such as whether and how any Māori names or words should be prevented from being used in .nz domain names, whether the .nz policies (or .nz Rules if they are adopted) should be translated into te reo Māori and the issues the Panel identified in recommendation 15. Most importantly, this will be an opportunity for Māori to tell us what they think the issues are.

We have included the proposed principle from recommendation 1.4 in the draft .nz Rules in this consultation document. We have also included proposed amendments to the policy development process requiring us to engage with Māori when changing .nz policies.

We have included these into the draft .nz Rules to facilitate the discussion in our upcoming engagements with Māori. They should therefore be treated as placeholders until those engagements have taken place and we have indicated this in the draft .nz Rules.

We have also begun to take steps to improve our ability to engage with Māori. In October 2020, we appointed a Chief Advisor, Māori, one of whose responsibilities is to help improve our capability to engage with Māori.

How to have your say

Make a submission

This can take the form of a written submission on the questions raised in this document. Submissions on the questions are due by 2 April 2021.

This document contains a number of questions. You may wish to respond to one, many, or all of them.

InternetNZ is 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 may use the submission template provided here: [submission template](#).

You can make your submission by:

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

Use of information

The information provided in submissions will be used to inform InternetNZ's decisions on how the .nz policies should be changed. InternetNZ may contact you directly to clarify anything in your submission.

The Privacy Act 2020 establishes certain principles with respect to our collection, use and disclosure of information about individuals. Any personal information you supply to InternetNZ in the course of making a submission will only be used by InternetNZ in managing incoming submissions.

InternetNZ has an open policy-making process and typically publishes all submissions to encourage open conversation. Contact details will not be published. If you need to include confidential information in your submission, please contact dotnzreview@internetnz.net.nz to discuss what arrangements InternetNZ might implement if we were to agree to receive the confidential information.

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Part B: Draft .nz Rules

This Part of this consultation document examines the Panel's recommendations on simplifying and consolidating the .nz policies (recommendations 2-4). Given the relationship between the recommendations, this part examines them together.

Panel recommendations on simplifying and consolidating the .nz policies

The .nz policies are currently comprised of the following documents:

- the .nz Framework Policy[2]
- the .nz Policy Development Process[3]
- the .nz Principles and Responsibilities Policy[4]
- the .nz Operations and Procedures Policy[5]
- the .nz Dispute Resolution Service[6].

These documents often overlap, which can make them difficult to navigate and interpret. The documents contain a mix of principles, policies, business rules and procedures without clear demarcation and are not written in plain English. It can sometimes be difficult to determine who is responsible for discharging an obligation, as it is often left unsaid.

Panel's recommendations

The Panel recommended the .nz policies be rewritten so they were simpler, easier to navigate and more user-friendly. It recommended that we:
- restructure the .nz policies into a new framework consisting of four categories: principles, policies, rules and procedures, with a guidelines appendix (**rec 2**)
- rewrite the .nz policies so they are easier to understand and navigate (**rec 3**)
- explain how the policy framework functions, including definitions, the relationship between principles, policies, rules and procedures (**rec 4**).

The Panel considered that each policy and subsequent rule and procedure should be integrated into a hierarchy under one of the governing principles for clarity and to aid understanding of the overall policy environment.

See pages 8-10 the [Recommendations Report](#) for more details.

Proposed method of implementation

We agree with the Panel's assessment that the current .nz policy documents need rewriting and restructuring. We have released, alongside this consultation document, a draft document entitled the '.nz Rules'. This consolidates and

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[2] [.nz framework policy » InternetNZ](#)
[3] [Policy development process » InternetNZ](#)
[4] [Principles and responsibilities » InternetNZ](#)
[5] [Operations and procedures » InternetNZ](#)
[6] [Dispute Resolution Service policy » InternetNZ](#).

simplifies the .nz policy documents listed at the beginning of this section (other than the Dispute Resolution Service and the provisions on conflicted names).[7]

The draft .nz Rules show how we would propose implementing the Panel's recommendations 2-4. We have followed the Panel's broad categories but have called them principles, policies, operational rules, and procedures & requirements. We would like your feedback on the different levels, particularly on whether there is enough of a difference between policies and operational rules to justify separating them.

We are not convinced that a guidelines appendix is needed. There are other options to achieve the same outcome (e.g., standalone guidelines or explanatory materials published on our website, as needed). While explanatory materials are not our focus at this stage, we could develop these in the future if uncertainties arise about how to comply with the .nz Rules.

Relationship between principles, policies, operational rules and procedures & requirements

The section 'How these .nz Rules are organised' on page 6 the draft .nz Rules explains the relationship between the principles, policies, operational rules, and procedures & requirements:

- The **principles** set out the basis on which all activity related to the registration and use of .nz domain names should be judged. They will be the key factor in determining whether .nz is operating as the community intends. They will help InternetNZ consider what Policies, Operational Rules and Procedures & Requirements .nz should have, how they should operate and whether they should be modified.

- The **policies** are based on the Principles and set out the course of action to be taken by InternetNZ and DNCL in determining what the Operational Rules and Procedures & Requirements should be. They will also guide InternetNZ and DNCL in performing their registry and regulator functions.
- The **operational rules** provide detailed rules about how .nz operates. They set out:
  - how .nz domain names are registered, renewed, assigned and cancelled
  - optional features that can be applied to .nz domain names
  - the terms of .nz domain names and how they are renewed
  - the obligations of participants in .nz
  - how moderated .nz domains are operated
  - how people can search the .nz register
  - how entities are authorised to be registrars in .nz

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[7] We have not included the .nz Dispute Resolution Service in Schedule 2 because we are not proposing substantive changes to it. But we will need to review it if the draft .nz Rules are approved to ensure consistent terminology. We have not included provision on conflicted names in Schedule 3 because we will review that when we begin work on the Category 2 recommendations later in 2021. Nor have we included the Billing Business Rules referred to in Schedule 4.

        ○   how the .nz Rules are enforced and how disputes between
             participants are investigated and managed.
- The **procedures & requirements** detail the procedural and minor or
  technical requirements of .nz or the domain name system.

The recently published [.ie policy document](#) for the Ireland ccTLD takes a similar approach. Their policy document contains processes, procedures, rules and guidelines.

Implications

Easier to navigate and understand

We consider the draft .nz Rules to be easier to navigate and understand than the current .nz policy documents. We have tried to ensure people will only need to go to one place to find the information they need.

For example, all of the information in the draft .nz Rules on the following topics has been included under the relevant subject heading:

- registration of a .nz domain name
- changing the domain name holder of a .nz domain name
- changing the registrar of a .nz domain name
- cancelling a .nz domain name
- optional features of a .nz domain name
- registrar billing
- roles, responsibilities and obligations of participants in .nz
- moderated domains
- information management
- authorisation of registrars
- complaints and enforcement.

We have also tried to reduce the jargon and write as plainly as we could.

Ability to modify technical and minor rules

The separation of the draft .nz Rules into these categories would also enable procedural and minor or technical requirements (i.e., at the procedures & requirements level) to be modified by notification rather than a full policy development process. We discuss this below in the section on the Panel's recommendations on the policy development process.

Interface with the .nz agreements

One of the implications of simplifying and rewriting the .nz policies is that we would need to review the Authorisation Agreement, the Connection Agreement and other relevant .nz agreements. We would need to ensure the agreements were consistent with the new terminology and that they interfaced properly with the new .nz Rules. We are currently assessing what this work would involve but we do not envisage this process would carry a large burden.

Inadvertent changes

As we consolidated and simplified the .nz policies, we have tried to reduce them down to their essential parts. We have not retained policies that we considered were cumbersome, outdated or inaccurate. We have also sought to write the draft .nz Rules in a way that will support the build of the new registry under the Registry Replacement project.

In doing so, we may have proposed a change in the draft .nz Rules that would have consequences we do not intend. We would therefore appreciate your feedback on how we have simplified the .nz policy documents in the draft .nz Rules.

To assist readers who would like to compare the current policy documents with our proposed changes, we have included a comparison table in **Appendix 2** comparing the two.

Questions

1. Do you favour consolidating and rewriting the .nz policies generally speaking? Why / why not?
2. Could the draft .nz Rules be improved? How?
3. Do you think the difference between policies and operational rules is clear enough? If not, how could this be improved?
4. Do the draft .nz Rules leave out anything currently in the existing .nz policy documents that should be retained?

Part C: Proposed Implementation of Other Panel Recommendations

Panel recommendations on new principles

The .nz Framework Policy[8] sets out the current guiding principles that govern the operation of Aotearoa/New Zealand's domain name system:

- **Rule of law**: The laws of New Zealand apply, and the lawful instructions of the courts and authorities made as part of due process will be complied with – noting that this may require action that overrides the following principles.
- **First come, first served**: Any domain name can be registered if available for registration on a first come, first served basis.
- **No concern for use**: The ccTLD manager is not concerned with the use of a domain name.
- **Low barriers to entry**: Entry requirements are not set higher than necessary to maintain a competitive, stable market for registrars.
- **Structural separation**: Regulatory, registry, and registrar functions are structurally separated.
- **Clear chain of relationships**: All 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.
- **Registrant rights come first**: The rights and interests of registrants are safeguarded.

Panel recommendations

The Panel recommended we introduce five new guiding principles for the management of .nz:
- **.nz should be secure, trusted and safe**: .nz infrastructure must be dependable and secure, and .nz be trusted and safe
- **.nz should be open and accessible**: everybody should be able to observe, participate, innovate and enjoy the benefits of .nz
- **.nz should serve and benefit New Zealand and reflect and be responsive to our diverse social, cultural and ethnic environment**
- **.nz should support te reo Māori and participation in .nz by Māori**
- **.nz should enable New Zealand to grow and develop**: it should help people, businesses and organisations connect, create, innovate and grow.

See pages 6-7 of the Recommendations Report for more details.

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[8] .nz framework policy » InternetNZ

Proposed method of implementation

We have incorporated the above principles into an early section of the draft .nz Rules under a heading entitled '.nz Principles'. There are only two proposed changes from what the Panel recommended.

First, we have removed the word 'safe' from the first principle on the basis that we do not consider it is sufficiently clear what .nz being 'safe' means in this context.

The first principle, as it appears in the draft .nz Rules, therefore reads:

> **.nz should be secure and trusted**: .nz infrastructure must be dependable and secure, and .nz be trusted

Second, we have added 'me ōna tikanga' to the principle about te reo Māori and the participation of Māori in .nz. This is to recognise the relationship between te reo Māori and te ao Māori, and that they always run parallel to each other.

> **.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori**

Implications

The new principles would change the focus from a more technical set of principles to a higher-level, aspirational more holistic vision for .nz.

As mentioned above, the new principles:

- Would be the key factor in determining whether .nz is operating as the community intends
- Will help InternetNZ consider what Policies, Operational Rules and Procedures & Requirements .nz should have, how they should operate and whether they should be modified.

Questions

5. Do you consider the above principles should be adopted as the new principles for the .nz Rules? Why / why not?
6. Do you agree that 'safe' should be removed from the first principle? Why / why not?
7. Do you think any of the principles should be modified in any other way?

Panel recommendations on existing principles

The [.nz Framework Policy](#) sets out the current guiding principles that govern the operation of Aotearoa New Zealand's domain name system. They are listed in the previous section.

Panel recommendations on existing principles

Rule of law

The Panel recommended the 'rule of law' principle be retained as a policy in what we are now referring to as the .nz Rules.

First come, first served

The Panel recommended the 'first come, first served' principle be retained as a policy but modified to recognise:
- some domain names are not available for registration due to security concerns (like 'gov.nz' or 'nic.nz' due to their similarity with names related to government and domain name operations respectively)
- certain Māori words or names that might be restricted as a result of conversations between Māori and InternetNZ.

No concern for use

The Panel recommended the 'no concern for use' principle be retained as a policy but rewritten to acknowledge that illegal activity requires intervention.

The Panel noted the importance of Internet openness and considered any legitimate restrictions on use should be limited. It recommended the rewritten principle address the following:
- there should be no concern for legitimate use[9]
- restrictions on use must 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.
- Any restrictions should be transparent: the basis for restrictions and the process for restrictions, should be transparent and subject to a fair process.

Low barriers to entry

The Panel recommended the 'low barriers to entry' principle be retained as a policy but considered it was too narrow because it focuses solely on competition between registrars. It recommended its scope be widened to focus on supporting openness in, and encouraging access to, the .nz domain space for registrars, for resellers, for domain name holders and all others in or interacting with the system.

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[9] The Panel discussed its concept of concern for legitimate use in its recommendations 20 and 21 on pages 18-19.

Structural separation

The Panel recommended the 'structural separation' principle be retained as a policy.

Clear chain of relationships

The Panel recommended the 'clear chain of relationships' principle be retained as a policy.

Registrant rights come first

The Panel recommended that the 'registrant rights come first' principle be removed. It could see no reason why domain name holders' rights should be prioritised over the rights of the New Zealand public or at least balanced with them and considered a more holistic approach to actors in the domain name space was more appropriate.

See pages 11-13 of the [Recommendations Report](#) for more details.

Proposed method of implementation

We largely propose following the Panel's recommendations on the existing principles. This means that most of the concepts are retained, or modified, but they are situated in a different place in the new structure of the draft .nz Rules: they become policies as proposed by the Panel. Although they are no longer 'principles' - the new principles set out in the previous section will be the new principles for .nz - they still carry significant weight and must still be followed.

Rule of law

The 'rule of law' principle has been included in clause 1.6 of the draft .nz Rules:

> *1.6 The laws of New Zealand apply to these .nz Rules. The lawful instructions of the courts and the authorities made as part of due process will be complied with.*

New clause 1.6 has a minor modification. The passage "... – noting that this may require action that overrides the following principles" has been removed. This no longer made sense as the clause does not appear alongside the other principles as it used to.

First come, first served

The 'first come, first served' principle has been included in clause 2.1.1 of the draft .nz Rules.

> *2.1.1. Any available domain name can be registered on the .nz Register on a first come, first served basis in accordance with these .nz Rules.*

Clause 2.1.1 contains a minor modification: "Any domain name can be registered if available for registration..." becomes "Any available domain name can be registered...".

We consider that the 'first come, first served' principle is better suited to a policy relating to registration and cancellation than as it was - a principle purporting to apply to the .nz policies as a whole. Although important, the principle is actually of somewhat narrow application compared to what the .nz Rules as a whole cover.

We have not yet considered the Panel's recommendation on whether any words should not be freely available for registration. An important part of this work will be to consider whether any Māori names or words should not be made available for registration. We would also need to consider whether non-Māori names or words should not be available for registration.

We intend to consider this as part of our engagement with Māori on various issues relating to .nz and Māori over the coming months. See Panel recommendation 15 for examples of the sort of questions that might be included in our engagement with Māori.

No concern for use

The 'no concern for use' principle has been included in clause 2.1.2 of the draft .nz Rules as proposed by the Panel:

2.1.2 InternetNZ is not concerned with the use of a .nz domain name.

We have not yet considered how we might modify 'no concern for use' in a more substantive way. We consider it would be more appropriate to consider this at the same time as we consider whether it would be feasible and desirable to develop a trusted notifier regime as contemplated by the Panel in recommendation 21.[10] This work will be done as part of tranche two of our work in considering the Panel's recommendations.

Low barriers to entry

The 'low barriers to entry' principle has been included in clause 1.5:

1.5 InternetNZ and DNCL will seek to minimise barriers to enter the .nz market as a Registrar. Entry requirements will be set no higher than necessary to ensure .nz is secure and trusted and to maintain a competitive and stable market for registrars.

Clause 1.5 has some minor modifications:

- InternetNZ and DNCL are expressly referred to

- there is a reference to minimising barriers to entry for registrars

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[10] The Panel recommended that InternetNZ and DNCL undertake a work programme to develop a trusted notifier regime. The Panel envisaged expanding DNCL's work with trusted notifiers to enable DNCL to suspend a .nz domain name when notified it is being used for illegal activity.

- there is a reference to .nz being secure and trusted, recognising a stable registrar market is not the only thing relevant when considering whether to impose barriers to entry.

We do not consider that 'low barriers to entry' needs to be extended in scope to resellers and domain name holders because we consider the proposed new general principle on openness and accessibility covers similar ground.

Structural separation

The 'structural separation' principle has been included in clauses 1.3 and 12.1.1:

1.3 Responsibility for the registry, registrar and regulatory functions of .nz is held by separate entities:
  a. the registry function is performed by InternetNZ, which runs the .nz Register
  b. the regulatory function is performed by DNCL, a subsidiary of InternetNZ
  c. the registrar function is performed by various entities DNCL has authorised to operate as Registrars.

12.1.1 The registry, registrar, and regulatory functions of .nz will be structurally separated. DNCL will perform the regulatory function, under a delegation from InternetNZ.

Clause 12.1.1 is essentially unchanged from the 'structural separation' principle.

Clear chain of relationships

The 'clear chain of relationships' principle has been included in clause 1.4:

1.4 Each Domain Name Holder has an agreement with their Registrar. Each Registrar has an agreement with InternetNZ and with DNCL. DNCL can intervene in these relationships in accordance with these .nz Rules and associated agreements.

Clause 1.4 is essentially unchanged from the 'clear chain of relationships' principle.

Registrant rights come first

We have not included the 'registrant rights come first' principle.

Implications

We do not consider there are any important implications of converting the current .nz principles into policies under the new structure. They would no longer be principles but would still form part of the .nz Rules and have operative effect.

The 'first come, first served policy' and the 'no concern for use' principles would not initially be modified as recommended by the Panel. They would be modified once we have engaged with Māori and assessed the Panel's trusted notifier regime recommendation.

Given that the proposed .nz Rules would not be brought into effect until the new registry was implemented, these other policies would likely be modified before the .nz Rules came into effect.

Questions

8. Do you think we should implement the Panel's recommendations on the existing principles as proposed above? Why / why not?
9. Have we correctly assessed the implications of our proposed approach to the existing principles? Are there other implications we have not considered?
10. Is there a better way of doing this?

Panel recommendations on the policy development process

The Policy Development Process policy governs how we create and amend .nz policies. Anybody can identify possible policy requirements and inform us or DNCL. We then define and scope the policy topic and initiate a public consultation process, having regard to the nature and circumstances of the proposed policy or amendments. Following the consultation, we make a decision on whether to approve the policy or amendments.

We can also develop and approve an interim policy if circumstances require the urgent amendment of an existing policy to preserve the integrity of the .nz register. We must review an interim policy if it is still in effect six months after it is implemented.

The Panel's recommendations

The Panel recommended we amend the Policy Development Process to detail how principles, policies, rules and procedures can be changed.

The Panel considered the .nz policies should be periodically reviewed and that the frequency should depend on which part of the policies were being renewed. It recommended:

- policies be updated on a rolling three-year basis
- rules be reviewed more frequently as needed
- procedures adjusted as necessary.

The Panel considered the high-level nature of the principles meant they should be reviewed less frequently - perhaps every five years, when a full policy review might be warranted.

The Panel also considered consultation requirements should differ, depending on the parts of the policies being focused on. For example, amendments to the guiding principles and policies would usually require public consultation but the rules or procedures might need consultation only with affected groups and minor changes to procedures might merely require notification.

See pages 11-13 of the [Recommendations Report](#) for more details.

Proposed method of implementation

We have included a proposed new Policy Development Process in Schedule 4 of the draft .nz Rules.

We do not propose adopting a formal fixed review schedule for the amendment of what we are now referring to as the .nz Rules. It is preferable in our view to continue the current practice of allowing anybody to raise an issue for consideration as and when required.

We support the Panel's recommendation that consultation requirements differ on the basis of the parts of the .nz Rules being focused on. In particular, we agree there should be greater flexibility to modify the lowest-level .nz procedures & requirements. The draft policy development process in Schedule 1 of the draft .nz Rules would enable us to change .nz procedures & requirements by 20 working days notice in writing.

However, we do not support having a different process for the amendment of principles, policies or rules. We propose requiring them to go through the standard policy development process.

Other changes to the policy development process in Schedule 4 of the draft .nz Rules include:

- we will take into account the .nz principles, operational needs and the impact not starting a policy process would have on the parties involved in .nz when deciding whether to start a policy process
- greater clarity around how to request we amend the .nz Rules
- a requirement for us to publish any request we receive
- a requirement to consider whether any Māori interests are affected by the proposed change to the policies and, if so, determine what level of engagement with Māori is appropriate.

Implications of implementing this option

A key implication of this approach would be that we could amend procedural and minor or technical requirements by 20 working days notice in writing.

A full policy development process can be expensive and time-consuming. The lack of a simple process to make even minor or technical changes can mean simple changes can be delayed or workarounds employed instead of continuously improving procedures and processes.

This would provide greater flexibility for us to make these minor and technical changes to the .nz Rules.

Another implication is that we would need to consider the form of engagement with Māori before amending the .nz Rules. There are many questions that still need to be worked through. The key ones involve how decisions are made on the Māori interest and the level of engagement required and who makes them.

As we discussed in the .nz and Māori section above, we will be engaging with Māori over the coming months on these issues, among others.

Questions

11. *Do you think InternetNZ should have greater flexibility to adjust .nz procedures & requirements by notice in writing?*
12. *Is 20 working days enough notice before a change to the procedures & requirements is made?*
13. *Are there any .nz procedures & requirements you think should be a .nz policy or .nz rule? Are there any .nz policies or .nz rules you think should be a .nz procedure?*

Panel recommendations on the exceptional circumstances provision

Clause 11.8 of the Operations and Procedures policy states:

11.8 In emergency or exceptional circumstances (for example, terrorist attack, cyber security attack, or force majeure event) where the Domain Name Commissioner reasonably considers that use of the .nz domain name space is causing, or may cause, irreparable harm to any person or to the operation or reputation of the .nz domain space, the Domain Name Commissioner may take action to mitigate or minimise that harm. Action taken under this clause shall be proportionate to the harm and is limited to the temporary transfer, suspension or locking of a domain name registration.

These clauses were added to the Operations and Procedures policy following the Christchurch terror attacks.

The Panel's recommendation

The Panel recommended that clause 11.8 be modified and become a permanent part of the policy framework. It considered the clause should be redrafted to clarify the threshold to be met before the provision may be invoked. Key terms like "irreparable harm" were viewed as complicated and difficult to understand and context-specific.

The Panel also considered that we should review the exceptional circumstances provision if we decided to introduce another form of self-regulatory intervention to address domain name abuse (like the a trusted notifier regime the Panel recommended[11]).

See pages 18-19 of the [Recommendations Report](#) for more details.

Proposed method of implementation

Clause 12.2.15 of the draft .nz Rules states:

The Commissioner may change the Registrar of a .nz domain name, or suspend, assign, cancel or impose a Compliance Lock on it, if:
   a. not doing so would be contrary to the terms of an order from a court or tribunal of competent jurisdiction or otherwise unlawful
   b. necessary to preserve the security, stability or resilience of the DNS
   c. there is an emergency or exceptional circumstances (for example, terrorist attack, cyber security attack, pandemic, or other force majeure event) and the Commissioner reasonably considers:
      i. the use of the .nz domain name is causing, or may cause, irreparable harm to any person or to the operation or reputation of the .nz domain space

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[11] See recommendation 21. On 4 December 2020, the InternetNZ Council decided we would begin to explore whether developing a trusted notifier regime is desirable and feasible after September 2021.

> ii.   *the action would mitigate or minimise the harm and be proportionate to it.*

Draft clause 12.2.15 consolidates clauses 11.7 and 11.8 of the Operations and Procedures policy and adds a new paragraph (b) enabling the Commissioner to take action if it is necessary to preserve the security, stability or resilience of the DNS.

Implications

Adopting clause 12.2.15(c) of the draft .nz Rules would permanently replace interim clause 11.8 of the Operations and Procedures policy. The Commissioner would retain the ability to take steps in emergency or exceptional circumstances to mitigate or minimise harm the Commissioner reasonably considers is or could be caused by the use of a domain name.

Our proposed clause contains some differences from the existing interim clause:

- The existing clause allows the Commissioner to temporarily change the Registrar of the domain name, or temporarily suspend or lock it. The proposed new clause also enables the Commissioner to assign it to a third party or cancel it.
- We have tried to improve the drafting to clarify each of the legal tests.
- Before taking action, the Commissioner must reasonably consider the use is causing or may cause irreparable harm to a person or the reputation of the .nz domain space. The Commissioner must also reasonably consider the action will mitigate or minimise the harm and will be proportionate to the harm. Under the current clause, the mitigating or minimising and the proportionality are drafted as absolute tests rather than a 'reasonably considers' test.
- We have inserted a pandemic into the list of examples to clarify that the circumstance is covered by the clause.

Questions

14. Do you think we should implement the Panel's recommendations on the exceptional circumstances provision as proposed above? Why / why not?
15. Have we correctly assessed the implications of our proposed changes to the exceptional circumstances provision? Are there other implications we have not considered?
16. Is there a better way of doing this?
17. Should the Commissioner be able to take any of the listed steps (change the Registrar, suspend, assign, cancel and lock) in the circumstances described in paragraphs a, b and c or or just some? If not, which steps should apply to circumstances?

Panel recommendations on privacy

Domain name holders must provide their contact details and the contact details of a technical contact and an admin contact when registering a .nz domain name. Contact details include their name, email address, phone number and home address. These details are then publicly searchable via the query service.

Individuals may not know they are entitled to request the Individual Registrant Privacy Option (**IRPO**), which withholds some of their contact details from the public database. Only the domain name holder's name, country and email address are provided.

Making personally identifiable information publicly available can facilitate the contact's information being used for malicious purposes. People may be deterred from registering a .nz domain name, or encouraged to use false details due to privacy concerns.

Panel recommendations

The Panel wanted to ensure that people's privacy was enhanced while still maintaining accountability and transparency. They considered this would involve:

- only essential information being collected from domain name holders
- the information being stored securely
- domain name holders being aware of how their information is accessible online, and when and how it can be accessed on request by other people, including government agencies.

The Panel recommended:

- protecting domain name holder details, other than name, by default (**recommendation 29**)

- making the provision of admin and technical contacts optional but making them publicly available if provided (**recommendation 30**)

- providing an email communication function to enable domain name holders to be contacted without revealing their email address (e.g. web form) (**recommendation 31**).

The Panel considered that domain name holders' names should always be available to the public. It provides transparency and accuracy about who holds a domain name and supports accountability of use. The Panel did not consider the physical address, email address or phone number of a domain name holder should be available by default. Those fields are collected primarily to support internal registry processes and disclosure was not necessary for transparency, accuracy or to support accountability of use. The Panel suggested that domain name holders should be able to make that information available voluntarily.

See pages 23-25 of the [Recommendations Report](#) for more details.

Proposed method of implementation

We propose a potential implementation of the Panel's recommendations in two stages. For the first stage, we propose:

- modifying the IRPO so that more contact information is withheld from the query service that DNCL provides
- making the nominated secondary contacts details (like admin and technical contact details) optional fields.

We will consider whether to provide a default privacy option to domain name holders when we consider the Category 2 Panel recommendations.

Withholding more contact information from the query service

We propose two changes to withhold more information from the query service:

- moving from the current "per-contact" to a "per-domain" IRPO
- withholding more personally identifiable information from the query service.

Currently the privacy option is applied per contact, so a domain name holder may have their details withheld, while nominated secondary contacts like a technical contact or admin contact may have their contact details available. When the IRPO is applied, the query service still returns the email address, and country of residence of the domain name holder and any nominated secondary contacts.

We propose withholding more information, so that all details will be withheld other than the name of the domain name holder and any nominated secondary contacts' names.

We will create a communication function so domain name holders are contactable without revealing their email address as part of the registry replacement project.

Nominated secondary contacts become optional

All of the current domain name holder contact details will remain required fields. Nominated secondary contracts like admin and technical contact details will be optional fields. If a domain name holder requests the IRPO and is eligible, the IRPO will apply to the nominated secondary contacts as well.

Implications

Individuals who opted-in to the privacy option would have greater privacy protections. The listed country of the domain name holder would not be disclosed.

We would become the mediator between domain name holders and members of the public who wished to contact the domain name holder. We would need to host and maintain a contact form indefinitely.

We will consider whether privacy should be applied by default when we consider the Category 2 recommendation from the Panel. We think it makes sense to

consider this issue when we are considering the Panel's recommendation on the implementation of a trusted notifier regime.

We have sought to reflect our proposed approach into the draft .nz Rules.

Questions

18. Do you think we should implement the Panel's recommendations on privacy as proposed above? Why / why not?
19. Have we correctly assessed the implications of our proposed changes to the privacy option? Are there other implications we have not considered?
20. Is there a better way of doing this?

Panel recommendations on pricing variability and incentives

The .nz policies require us to charge Registrars the same fee for each .nz domain name. Clauses 5.1-5.3 of the Principles and Responsibilities document states (emphasis added):

5.1 Registration of .nz domain names is billed monthly with terms ranging from one month to 120 months.

*5.2 A fixed wholesale fee will be charged by the Registry to Registrars monthly for registrations and renewals. **This wholesale fee will be the same for all .nz domain names.** Fees will be charged for the registration and renewal terms set by the Registrar. The Registry may also charge Registrars for any optional .nz services that may be developed as agreed with DNCL.*

5.3 The wholesale fee will be set by InternetNZ (in consultation with DNCL) and reviewed regularly and Registrars will be advised of any changes. It will be set at a level that ensures .nz remains a world class registry and to promote public good works in accordance with the Objects specified in its Constitution.

The Panel's recommendations

The Panel recommended allowing us to do the following:[12]

- Adopt **variable pricing** for registrars instead of a flat fee (recommendation 33). This would enable us to:
  - offer, on the same terms to all registrars, discounts to encourage more domain name registrations
  - encourage uptake from target groups like SMEs and underserved communities.
- Offer **rebates** to the domain name holder via the wholesale fee (recommendation 34). This would enable us to target domain name holder groups and be used to support businesses, te reo Māori and other priorities. Safeguards would likely be required to ensure our pricing practices and incentive programmes were fair and reasonable.
- Provide **incentives**, like one-off incentive payments or ongoing incentive programmes, to registrars to drive specific initiatives (recommendation 35). This would encourage investment into supporting technology and security standards and enable us to incentivise registrars to be more innovative to drive .nz market growth.

The Panel recommended that we use the variable wholesale price, rebate and incentive mechanisms to promote .nz policy goals (recommendation 36).

See page 28 of the [Recommendations Report](#) for more details.

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[12] See *Recommendations Report* [dotnz-policy-review-recommendations-report.pdf (internetnz.nz)](#), pages 27-28.

Proposed method of implementation

Additional features and add-ons

We propose clarifying in the .nz Rules how we can offer registrars enhanced features or add-ons for .nz domain names. We propose that the .nz Rules:

- enable us to offer enhanced features or add-ons to registrars
- ensure that the enhanced features or add-ons:
  - are offered to all registrars on the same terms
  - are opt-in
  - align with .nz policy goals
- enable us to charge a fee additional to the standard wholesale fee for those who adopted the enhanced feature or add-on (i.e., bundle pricing).

The types of additional features and add-ons we contemplate include registry lock and bundled products (e.g., buy a .nz domain name and get, at a discounted price, additional 'typosquat' domain names misspelling variances of the registered domain name.

Additional feature descriptions would be published on our website.

Incentives

We also propose clarifying that we can provide incentives to encourage promotion or adoption of .nz or specific .nz features or improve the quality of services on .nz. We consider these incentives (which could include variable pricing options) should be subject to the same rules as the offer of enhanced features and add-ons for .nz domain names.

We therefore propose that the .nz Rules:

- enable us to offer incentives to registrars, for example through rebates, bundle pricing or co-marketing activity
- ensure that the incentives:
  - are offered to all registrars on the same terms
  - are opt-in
  - align with .nz policy goals.

We have not yet incorporated these proposed changes into the draft .nz Rules. At this stage we are seeking your views on the proposed approach at a conceptual level.

Implications of our proposed approach

Some of the advantages of our proposed approach include:

- **Equal terms for registrars and flexibility of approach**: All authorised registrars would continue to offer .nz domain names as a base offering.

Additional features, add-ons and incentives would be offered to all registrars equally. They would have the flexibility to choose which additional .nz features, add-ons or incentives they would like to take up.

- **Opportunities to increase the use of .nz:** variable pricing will enable us to encourage uptake and use of .nz, and incentivise good privacy and security practices

Some of the disadvantages include:

- **Equal terms for registrars may not create equitable outcomes:** There is a risk that variable pricing incentives may not benefit all registrars equally. We will need to ensure that terms are developed in a way that all registrars can benefit from.
- **May increase complexity for registrars:** the approach may increase complexity for registrars. However, each registrar could decide whether the new feature would provide enough value to their customers to offset the added complexity.
- **Potential consumer confusion:** consumers might be confused about which registrars provide which services. We could however show on our website which features are available through which registrars. This will enable the public to match their needs to providers.

Questions

21. Do you think we should implement the Panel's recommendations as proposed above? Why / why not?
22. Have we correctly assessed the implications of clarifying that we can offer enhanced features, add-ons and incentives? Are there other implications we have not considered?
23. Is there a better way of doing this?
24. How could we implement this in a way that will maximise the benefits for all registrars?

Part D: Registry Replacement Project Issues

Minimum registration and renewal period

The minimum period for which a .nz domain name can be registered or renewed is one month. The registry replacement project requires us to decide what the registration period should be in the new registry.

Standard practice among the majority of domain registries around the world is that domain registration and renewals are for a minimum term of one year and most allow for terms up to 10 years.

The main rationale for our one-month minimum registration period was to accommodate ISP-based registrars.[13] It was implemented when the .nz shared registry system was established.

The registrar market has changed significantly since the shared registry system was established:

- In 2004, ISP-based registrars accounted for around 36% of the .nz domain name market.

- At the end of 2019, ISP-based registrars only accounted for around 3.76% of the market.

The use of one-month renewals has similarly declined:

- In 2004 they reached their peak popularity, when they accounted for **36%** of all domain renewals.
- In August 2020, only 30,000 (rounded to nearest '000) out of 720,000 domains were renewing on a monthly basis (around **4.2%** of the registry).

Proposal

We propose moving to yearly registration and renewal periods with the minimum term being one year and the maximum being ten years.

Implications

Some of the advantage of moving to yearly minimum registrations and renewals include:

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[13] The June 2000 "Hine Report" prepared by the SRS Working Group recommended a monthly billing cycle on the basis that the "annual billing cycle does not fit well with some registrar's business systems". Anecdotally we understand that "some registrar's business systems" mainly referred to the monthly billing cycle of ISP-based registrars.

- **Easier for most registrars to understand and implement**

  Moving to yearly registrations and renewals would align us with standard practice across registries. This would therefore lower entry barriers for new registrars. Registrars could avoid the additional development that would be required to support a monthly period. It would also likely enable them to re-use existing components they have developed in connection with other registries.

  Moving to a yearly period would also ease migration onto another registry platform if it became necessary to do so.

- **Easier for most registrars to maintain**

  International registrars' understanding of our 1 month auto renewal terms can diminish between initially connecting to our registry and improving or revising their systems. This can result in the slow buildup of automatic renewals and eventual bulk cancellation when they reconcile their systems. This can be frustrating for registrars and can impact them financially. The recurring large-scale cleanup events can also negatively impact our business intelligence and market analysis data.

- **Easier for us to implement**

  Simplifying the billing term and frequency reduces the complexity required for the registry billing system.

- **Easier for us to maintain**

  A simplified billing system reduces the support overhead and the effort required for testing, troubleshooting issues and reconciliation.

One disadvantage is:

- **Impact on existing registrars using monthly renewals**

  Although ISPs were the original target audience for 1-month renewals, a small number of purely domain-focused registrars have used this as a point of difference.

Questions

25. Have we correctly assessed the implications of moving to yearly registrations and renewals? Are there other implications we have not considered?
26. Is there a better way of doing this?

Standardising the terminology

The terminology used to describe stages in the domain name lifecycle and the adoption of Unique Domain Authentication IDs (UDAI) were implemented prior to modern standard practice being developed.

Proposal

We propose aligning terminology in the draft .nz Rules to reflect standard language used by ICANN and other ccTLDs. This would involve aligning the terms used to describe stages in the domain name lifecycle with RFC3915 by retaining our current terminology but linking it to the equivalent standard terminology in a glossary.

We would also change references to 'Unique Domain Authentication IDs' or 'UDAI' to 'Authorisation Code' to reflect changes in our registry system.

Implications

The proposed approach would bring us in line with more of our international counterparts and align our terminology with international standards. This would reduce confusion over what our terminology means, particularly for .nz participants who operate internationally. It would also be likely to facilitate the adoption of the new registry system.

The proposed approach would be unlikely to have a significant impact on the operation or use of .nz. It may, however, lead to confusion while the new terminology beds in.

Questions

27. Have we correctly assessed the implications of aligning our terminology to reflect standard usage? Are there other implications we have not considered?
28. Is there a better way of doing this?

Appendix 1: Prioritisation of Panel recommendations

Category 1: Implement or consult on how to implement

A recommendation is in this category if it can either be implemented immediately or included in public consultation in February 2021.

Rec no.	Recommendation
	Simplification and consolidation of .nz policies
2	InternetNZ should restructure the .nz policies into a new policy framework consisting of four categories: principles, policies, rules and procedures, with a guidelines appendix
3	InternetNZ should rewrite the .nz policies so they are easier to understand and navigate
4	InternetNZ should explain how the policy framework functions, including definitions, the relationship between principles, policies, rules and procedures
	Principles
1	InternetNZ should introduce five guiding principles for the management of .nz: ○ **.nz should be secure, trusted and safe**: .nz infrastructure must be dependable and secure, and .nz be trusted and safe ○ **.nz should be open and accessible**: everybody should be able to observe, participate, innovate and enjoy the benefits of .nz ○ **.nz should serve and benefit New Zealand and reflect and be responsive to our diverse social, cultural and ethnic environment** ○ **.nz should support te reo Māori and participation in .nz by Māori** ○ **.nz should enable New Zealand to grow and develop**: it should help people, businesses and organisations connect, create, innovate and grow
6	The "rule of law" principle should be retained in the .nz policies
7	The "first come first served" principle should be modified and retained in the .nz policies
8	The "no concern for use" principle should be modified and retained in the .nz policies
9	The "low barriers to entry" principle should be modified and retained in the .nz policies
10	The "Registrant rights come first" principle should be removed

11	The "structural separation" principle should be retained in the .nz policies
12	The "clear chain of relationships " principle should be retained in the .nz policies
Policy Development process	
5	InternetNZ should amend the Policy Development Process to detail how principles, policies, rules and procedures can be changed
13	The .nz Policy Development Process policy should be amended to require InternetNZ to take reasonable steps to engage with Māori in the policy-making process
.nz and Māori	
14	InternetNZ should ensure it has the capability needed to engage with Māori
15	InternetNZ should engage with Māori on specific issues identified by the Panel and any other issues that arise in the engagement process
16 (a)	The .nz policies should be translated into te reo Māori
Accessibility	
17	InternetNZ and DNCL should produce policy documents in an accessible format that meets web accessibility standards
Emergency provision	
20	The interim provision should be modified and made permanent
Registrant details	
29	Registrant details other than name should be protected by default
30	Providing admin and technical contacts should be optional but made publicly available if chosen
31	InternetNZ should provide an email communication function to enable registrants to be contacted without revealing their email address (e.g. web form)
Growth	
33	Enable variable wholesale pricing to Registrars
34	Allow Registry to offer rebates to the registrant via the wholesale fee
35	Allow registrar incentives to drive specific initiatives
36	Require all pricing mechanisms (variable wholesale price / rebate / incentive) to be designed to promote .nz policy goals

Category 2: Explore whether desirable and feasible

A recommendation is in this category if we still need to do more work to explore whether it is desirable and feasible to implement due to its complexity, interdependence with other work or need to prioritise Category 1 work. No decision has been made about whether or not these recommendations should be accepted.

Rec no.	Recommendation
Accessibility	
16 (b)	There should be a long term vision to provide policy information in languages used by New Zealanders other than te reo Māori
18	InternetNZ should continue to monitor the utility of IDNs as a way to support all New Zealanders' use of .nz
19	InternetNZ should undertake a work programme to minimise the risk, or perception of risk, associated with the assumption that .nz is limited to New Zealand
Security and trust	
21	InternetNZ and the DNCL should undertake a work programme to develop a trusted notifier regime
22	InternetNZ should build necessary protections into the policy to include accountability and transparency
23	InternetNZ should introduce a requirement for registrars to meet minimum security standards
Conflicted domain names	
24	InternetNZ should set a deadline for registrants to resolve self-conflicted domain names
25	InternetNZ should set a deadline for parties to come to an agreement on resolving conflicted domain names
26	Following deadline expiration, names should be released for general registration
Registrant details	
27	InternetNZ should work with registrars to strengthen registrant validation practices
28	InternetNZ should clarify the purpose of collection of each field in the registrant, administrative and technical fields

32	InternetNZ should offer an optional NZ Legal Person Verification process which would result in a marker being added to the domain name registration data
Growth	
37	InternetNZ should work with registrars to establish a statement of registrant rights which the DNCL should monitor and registrars be accountable for by annual monitoring
38	DNCL should publish expanded objective market information to better inform registrant choice e.g. market share and renewal rates, but consults with registrars further on the specific material
39	The registry should define minimum service/feature set all registrars must provide
40	The registry should not be permitted to sell or market commercial services provided by InternetNZ directly to registrants via registry data
41	The registry should incentivise registrars to provide services it provides under agreed rules
42	Establish a Registrar Service Level Agreement System to enhance market operation
43	The registry should collect and communicate market information including customer segments, activity/utilisation and product use for industry to better understand and develop the .nz market
44	InternetNZ should change the policies to enable credible new second level names to be considered

Category 3: Not a priority in 2021

A recommendation is in this category if we do not plan to consider or prioritise it any time in 2021. These recommendations are generally not about the .nz policies and are more about our operations.

Rec no.	Recommendation
45	InternetNZ should embark on an education campaign with the registrar community to ensure registrants and the public are aware of the .nz domain space and its key benefits to New Zealanders
46	InternetNZ should develop an anti-abuse statement to be used as a non statutory tool to make it clear what actions will not be tolerated on .nz
47	Establish a value measure for .nz: Develop a measure for the value .nz creates in New Zealand, tied to the New Zealand Wellbeing framework

48	Set specific sector growth targets: Set targets for .nz growth in key target and underrepresented areas eg. SMEs, Māori
49	Support SME connectivity: Collaborate with Government digital forums referred to in the Small Business Council report to boost SME connectivity
50	Establish a Registrar/Registry marketing panel: Establish a new .nz marketing panel comprising the Registry, registrar, reseller and registrant representatives to provide .nz marketing and pricing guidance to InternetNZ
51	Make it easier for SMEs to get online: Work with the Registrar Advisory Group to develop bundled small business product including a domain and landing page - to make it easier for SMEs to get online
52	Review .nz registrant switching behaviour: Examine the existing domain switching/transfer activity by registrants between registrars to see if this can be made easier or more visible
53	Explore domain-drop mechanisms: A reasonable volume of domain names regularly "drop" or are not renewed by registrants. Internet NZ should explore a domain-drop mechanisms such as auctions to capture potential value in reacquired domain names