

Submission # 1

Received: 30/10/2024

Submitter: Michael Hamilton

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

No, it will create confusion amongst the wider public and reduce confidence in e-commerce.

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

Should a conflict exist the existing holder's name should be sacrosanct.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

The same rule should apply to all.

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

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- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

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- 6. Please provide any general comments on the approach.**

With internet fraud at unprecedented levels, we all need to do everything we can to minimise name conflicts.

Submission # 2

Received: 30/10/2024

Submitter: Cheryl Adamson

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Not really

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

The information released does not seem to take domain squatters into account. We are sitting with a conflict, but the owner of [redacted for privacy/sensitivity] is just squatting on the domain and not using it - surely they should lose their option of the .nz domain on this basis

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

As above

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

As above

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

we would pay this if it was resolved in our favour - as we have permission from all other holders except the squatter

- 6. Please provide any general comments on the approach.**

As above

Submission # 3

Received: 30/10/2024

Submitter: Simon Matthews

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Generally yes, but have not read in detail

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

The existing conflicted resolution process is flawed. In a situation like ours, we have an active domain name used for company business for over 20 years. The "sister" domain name to which the conflict exists is not in use, but for sale by a broker, and has been since the start of the process. That makes resolution impossible since there is no contact points. The new process should provide priority to active domain names. For example, if there is only one active domain name left at the end of the resolution time limit, they should be given a period (say two weeks) to purchase the .nz domain before it goes on general sale to the public.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

No comment

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

No comment

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

No comment

- 6. Please provide any general comments on the approach.**

As above, active, in-use existing domains should have priority in obtaining the equivalent .nz domain name.

Submission # 4

Received: 30/10/2024

Submitter: Shane Ross

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes, with one exception.

Where a domain has been "parked" by another party, take for instance our domain is [redacted for privacy/sensitivity] is owned by a prolific trader of domain names with the sole intention of selling it for high profit.

In this instance the [redacted for privacy/sensitivity] variant should be supplied to the active/trading entity and the individual who trades in domain names should not have rights to the .nz domain.

Domains are meant to be utilised not parked for profit and thus unused, we find ourselves unable to use the .nz variant because of the conflict between the two of us coupled with the high fees demanded by the other party to purchase the .co.nz variant.

The result of this is the .nz variant will never get used, also the .co.nz variant will not get used.

While I don't agree with the .co.nz variant being held by another party indefinitely for profit, I accept there is nothing that can be done here, but the .nz variant is a different story. It is completely unfair for a trading to effectively block access to a .nz domain based on attempting to extort profit.

Lastly, based on the above, I would have concerns this individual would grab the .nz domain when its released if we can't acquire it quickly enough. We aren't domain experts, he is, and I'm not confident we would be able to get the domain before he does.

This would result in two domains being effectively abandoned which makes no sense to me.

The domain should be provided to the entity that can prove they have an intention to actual use the domain for what it was designed for, not for banking it with the mindset to extort money from businesses later on.

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

Yes this is fine.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Yes this is fine.

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

Yes this is fine.

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

Yes this is fine.

- 6. Please provide any general comments on the approach.**

Yes this is fine.

Submission # 5

Received: 30/10/2024

Submitter: chris

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

yes

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

ok

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

yes

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

yes

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

\$1000 fee is to high for private individuals. This puts businesses at an unfair advantage

- 6. Please provide any general comments on the approach.**

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Submission # 6

Received: 30/10/2024

Submitter: Brendon Muir

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

I don't agree. Typically when someone looks to create a brand, they'll search the register to see if a compatible domain name is available. Calling the sudden opening up of these conflicted domain names for registration a 'fair' process is a stretch. They'll go to whoever can register them the fastest, similar to ticket sales at a popular concert. Conflicted domain names where two or more parties are operating businesses under those domains should be indefinitely unavailable for registration until there is just one remaining domain registered. The cost to administer this block would be low as the release can be automated in software when it is detected that there is no longer a conflict. Removal of the disputes process is fine in this case.

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

No views.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Of course.

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

Certainly these should be excepted, as well conflicted domains owned by currently operating New Zealand businesses.

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

Seems high given this whole situation occurred because the DNC decided to release the .nz level for registration in the first place. You should be responsible for the cost of that decision.

- 6. Please provide any general comments on the approach.**

The decision to open the .nz namespace seems questionable to me. It forced businesses to register more domain names (where they weren't conflicted) in order to protect them from registration by others. It's hard not to interpret that as a money-generating exercise. To now complain about the costs of administering that decision seems ironic.

The solution is simple. Lock the 1300 remaining conflicted domain names from registration until there is no conflict. Implement that solution in software and forget about it. Given enough time it will largely resolve itself.

Submission # 7

Received: 30/10/2024

Submitter: Dan Beverwijk

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

Fine

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Yes

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

Yes

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

overpriced

- 6. Please provide any general comments on the approach.**

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Submission # 8

Received: 30/10/2024

Submitter: Anton Smith

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

no - you clearly mention first come served in the explanation, that should also be applied here. The first registrant should get the conflicted domain.

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

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- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Yes

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

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- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

It's very high for smaller domains of lower value, and rules out resolutions happening that way for domains or people without means.

- 6. Please provide any general comments on the approach.**

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Submission # 9

Received: 30/10/2024

Submitter: Duncan Erasmus

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

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2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

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3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

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4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.

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5. What are your views on the level of the proposed determination fee being set at \$1,000?

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6. Please provide any general comments on the approach.

Currently, I am conflicted with another TLD. The individual who has the other TLD registers domains for commercial gain and has software to snipe domains as they become available. If the proposed approach involves releasing the domains to the general public at a set time (or even at a random time), there is zero chance that I will be able to obtain the domain because it will be registered within a second or less of coming available, outside of human abilities to register.

This policy essentially gives the domain to the individual who has better software and I will not be able to obtain the domain.

I would be more in favour of the first right of refusal being randomly assigned to one of the conflicted domains. Then I would have a fair chance.

Submission # 10

Received: 30/10/2024

Submitter: Mike Maclean

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

released conflicted names should be offered under limited-time auction

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Yes

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

No, everybody should be treated the same.

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

Fair

- 6. Please provide any general comments on the approach.**

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Submission # 11

Received: 30/10/2024

Submitter: Ricky Faesen Kloet

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes I do

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

I think this should be made available to two conflicted parties first, with the highest bidder given the domain. If no takers then opening it to be available to all as per all other domain names.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

No, I think it should be made available to conflicted parties first, and then opened for all if none take up the offer.

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

Not sure I understand the question. However, I feel it should be fair and even between all parties regardless of race, history, or colour. I don't think favoritism should come into the equation at all.

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

This is fine

- 6. Please provide any general comments on the approach.**

I think opening it to the conflicted parties and allowing them to bid on the domain, is the most fair and equitable option available. If none decide to proceed then it is made available for anyone to register.

Submission # 12

Received: 30/10/2024

Submitter: Scott Lovell

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

I agree with the process and the timeframe appears adequate

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Yes

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

Yes

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

I think this is a good idea to encourage the process to be engaged by serious applicants

- 6. Please provide any general comments on the approach.**

I am satisfied the approach has been well thought out and agree with its implementation

Submission # 13

Received: 30/10/2024

Submitter: Tom O'Neil

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

To some degree... I will explain below.

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

I own [redacted for privacy/sensitivity]. Another person owns the second-tier domain [redacted for privacy/sensitivity]. They are not using this domain and it is not live, however, I have used [redacted for privacy/sensitivity] for the last 20 years and have a functioning business built off the back of this brand. I am also an international author, have written for the Harvard Business Review and The Economist and am the Media Works careers and employment specialist, all built off the domain [redacted for privacy/sensitivity]. While I respect the first come first served approach, to own the domain [redacted for privacy/sensitivity] and not use it, thereby stopping me from using [redacted for privacy/sensitivity] I feel is poor competitive practice. I, therefore, ask for your assistance to release the domain to me for the use of my business.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Yes

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

Yes

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

Way too high respectfully for a small business. I would suggest \$500 :-)

- 6. Please provide any general comments on the approach.**

I own [redacted for privacy/sensitivity]. Another person owns the second-tier domain [redacted for privacy/sensitivity]. They are not using this domain and it is not live, however, I have used [redacted for privacy/sensitivity] for the last 20 years and have a functioning business built off the back of this brand. I am also an international author, have written for the Harvard Business Review and The Economist and am the Media Works careers and employment specialist, all built off the domain [redacted for privacy/sensitivity]. While I respect the first come first served approach, to own the domain [redacted for privacy/sensitivity] and not use it, thereby stopping me from using [redacted for privacy/sensitivity] I feel is poor competitive practice. I, therefore, ask for your assistance to release the domain to me for the use of my business.

Submission # 14

Received: 30/10/2024

Submitter: Chris Hodgetts

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

I do not think they need to be 'corrected' and the current system works well.

Conflicted domain names are just that, and I think attempting to open them up is wrong.

I think the conflicted parties can - like they currently do, go to mediation, or broker a payment to release to the other parties, but for .nz to just open them up, is not right.

I also believe opening them up can cause confusion to the end user thinking that the shorter one has more priority or authority when communicating - and this can be dangerous for all concerned especially with very similar type of companies, and allowing the shorter .nz name will cause an unfair balance and possibly closures of business.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

No, in what way is it a Security risk - it seems more of one to release them, especially for people / users / owners who might have their businesses impacted by a competitor buying the shorter name, and then giving more authority or legitimacy to it.

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

I do not believe this has anything to do with the .nz space - as you are referring to the release of shorter .nz names - which impacts all users of the .nz name space equally.

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

It should cost a bit more but seems right in principle.

- 6. Please provide any general comments on the approach.**

From your own documents, there are only 1,300 domains.

In a namespace of infinite possibilities of names, what is that in a percent of total overall possible domain names.

It seems like it was a solution looking for a problem, or more like, a consultant looking for an income.

There are many more people can buy even in the .nz space, leave the 1,300 conflicted as conflicted, there is no harm being done there, it might look bad on your 'books' but you sell virtual space on the internet, there are no real assets there, the money you might earn from the extra 1,300 domain names, will be the lunch budget of the CEO of InternetNZ for a year..

From all the reports I have read on this, there is actually no indication that any more money / income will be made from doing this - as in, from the 1,300 conflicts remaining, 1,200 have said they will buy the shorter domain name or the like.

And the NameServers already have this feature of conflicts built in, so just leave it as it is.

It will not, from what I can see, earn you all that much more income, and this whole process of consultants and reviews, will have cost more than you will earn from opening it up - all for 1,300 domains.

And the infrastructure you need to maintain for 1 domain is the same for 100 or 1,300 or a million (given the .nz namespace is infinitely large)

Please just leave it alone, you have already indicated most of the resolutions have corrected themselves by domains failure to re-register, or agreements by parties, or other means - so leave the 1,300 as they are, they will come right over time... there is no need to force this issue - it just seems idle hands needed to be seen to be doing something - and you are confusing activity with progress.

I just feel there is more .nz could be doing with its time, money, and resources than focusing on these 1,300 domain names.

Kind regards.

Submission # 15

Received: 30/10/2024

Submitter: Neville Higgs

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

Time frame seems reasonable but I am not really clear on what happens if a domain name is effectively still conflicted after 30 September 2025.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Yes

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

Yes

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

Yes

- 6. Please provide any general comments on the approach.**

What you have provided does not make it clear to me as to what happens if a domain name is still in conflict at the 30 September 2025.

Submission # 16

Received: 30/10/2024

Submitter: Kurt Marquart

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

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- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

No further wait is necessary.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Ok if registrant has a New Zealand primary address. Otherwise should not be able to register .nz top level.

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

Ok if registrant has a New Zealand primary address. Otherwise should not be able to register .nz top level.

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

fine

- 6. Please provide any general comments on the approach.**

Domain name squatters that are not New Zealand's primary addresses should be denied. Also, the same applies to registrants of .nz top level. Foreigners should not be entitled to the .nz domains. I also strongly support the Australian rules applying to .com.au domain names. I know that it is too late to change this situation but a strategy to set future limits of access should be started now.

Submission # 17

Received: 30/10/2024

Submitter: James Clark

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

The original spirit of the Registrar/Registry/Registrant .nz space was to err at being impartial, there is too much oversight over these conflicted domains.

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

Far too drawn out. Conflicted domains should simply be set free to be registered by whomever registers the name. First come first served. There was no similar performative action against one or more parties registering .org.nz / .net.nz / .co.nz / .net.nz yet low and behold .nz got special treatment - it never made sense.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

A general release is the only thing that should occur. Pick a date in 2025 remove "conflicted" status and let people register whatever they like.

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

Any policy based on race is racist.

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

Sounds like a good way to make money by the party interested in making money.

- 6. Please provide any general comments on the approach.**

The "conflicted" name approach seemed like a good idea at the time but in reality, it wasn't, it simply stopped '.nz' domains from being registered. I have been a key operator for the Registry/Registrar/Customer relationships since 2002/2003 (Wave Internet) and several more Registrar's over 20 years... I've seen it all. Whatever is done needs to be SIMPLE and NON-PHASED because anything else confuses the daylights out of customers.

Submission # 18

Received: 30/10/2024

Submitter: Kerry Jones

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

No Don't Agree. If someone owns the .co.nz domain already then they should have first refusal on the shorter .nz domain, the two are too similar and not fair.

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

In my opinion, there shouldn't be a conflict in the first place as the .co.nz holders should be the owners of the shorter version also by default.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Don't know

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

No not reasonable, whats this got to do with maori?

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

I don't see why I should have to pay to protect my domain.

- 6. Please provide any general comments on the approach.**

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Submission # 19

Received: 30/10/2024

Submitter: Colin Woods

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

Good

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

Yes

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

Yes

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

It's quite high

- 6. Please provide any general comments on the approach.**

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Submission # 20

Received: 30/10/2024

Submitter: Nick Partridge

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

No, where a name is conflicted and a party has not engaged - ever - the name should be deconflicted and the remaining parties given an opportunity to resolve the conflict. On the basis that "it's been long enough!"

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

It is not supportive of domain holders who have engaged with the process no.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

OK

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.**

OK

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

Very high.

- 6. Please provide any general comments on the approach.**

I do not understand why someone who has ignored the process from day 1 should - in effect - squat on a domain.

Submission # 21

Received: 30/10/2024

Submitter: Carl McKenzie

Submission:

- 1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.**

Yes

- 2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?**

The proposed general release is open to exploitation by bots. The best way to can see to combat the bots is to have a 7-day period where any of the conflicted parties can register the domain on a FIFS basis before releasing it to the general public.

- 3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.**

I believe it is reasonable

- 4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.**

I don't fully understand the implications of this, but I trust any exceptions under this principle will be common sense.

- 5. What are your views on the level of the proposed determination fee being set at \$1,000?**

Seems reasonable to me as long as the fee is only for resolving disputes between parties with conflicted domains, not for investigating domain squatters.

- 6. Please provide any general comments on the approach.**

Please put measures in place to ensure the domains are purchased by people who will actually use them, not by bots or squatters.

Submission # 22

Received: 31/10/2024

Submitter: Brendan McNeill

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

Yes

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

They are fine

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Yes

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.

The rules should apply to everyone equally regardless of ethnicity.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Yes, that's fine.

6. Please provide any general comments on the approach.

This has been a long process, let's keep it moving forward.

Submission # 23

Received: 31/10/2024

Submitter: Pete Belt

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

It is not consistent with "first come, first served basis" as it does not assign the disputed name to the owner who has the longest continuous registration period of the longer domain name.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

The process has been made complicated by not applying the "first come, first served basis" basis right from the outset.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

yes

4. Do you think the exception to general release where it is inconsistent with the .nz Principle '.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

yes

5. What are your views on the level of the proposed determination fee being set at \$1,000?

The fee, work, and all the drama can be avoided by applying the "first come, first served basis" principle by assigning the shortest name to the owner of the longest continuously-held longer name

6. Please provide any general comments on the approach.

This may appear to be a consultation process, but in the end a small group of people will choose a path forward having - in the process - wasted so much time and resources while continuing to side-step what should have been not only the common sense solution, but also the solution that has always been the core principle of the whole domain name system - that those who were there first and kept all the bills paid have priority over those who did not. The focus on a "fair process" has in the end killed the fairness of outcome.

Submission # 24

Paul King - Email received 31 October 2024

Attention InternetNZ

cc Commerce Commission copied in as a complaint and future evidence

Minister Goldsmith copied in as relevant Minister

Taxpayers Union copied in as the only entity kicking #ss and taking names in NZ

ACT Party copied in because they respect property rights

I would like this letter read out at your next Board meeting of the InternetNZ

I do not want another .nz domain name to be created like a name I have already paid good money for after being told it "was the only one". This would be a fraud for InternetNZ to sell another "similar" name to someone else for them to undermine my usage. This is known in law as "passing off". When I bought these names there was NO .nz domain only [.co.nz](#) and [.org.nz](#) and [.school.nz](#) etc .. it was impossible and also frowned upon by the system gurus like myself at that time to create a name such as [courier.nz](#) instead of [courier.co.nz](#)

I don't know how many times I have had to tell you this.

What will you do next? [.courier.nz.nz.nz](#)?

It is getting pretty close to harassment you continuously writing to me in different ways to get me to change my mind and allow you to create a "similar" .nz name to what I already own or to go into a bidding war for something similar to what I already own otherwise the value of my current item is halved.

I also do not like the trick you use to get people to respond and then put them into a situation where they have responded and now they are in a bidding war with another party. Silence is not agreement. Saying NO is NOT MAYBE.

Do I need to use words like [redacted - language] or something to make you understand?

I DO NOT WANT .NZ DOMAIN NAMES TO BE CREATED SO YOU CAN SELL THEM TO OTHERS AND WATERDOWN THE VALUE OF MY DOMAIN NAMES I PURCHASED WITH THE UNDERSTANDING THAT THEY WERE THE ONLY ONES.

This would be like Personalised Plates making a few new ones in different colours so they can make more money .. or selling a few Disney toys marked Disnee.- [redacted - language] . I am sure if I buy Disney.nz from you I will get a big [redacted - language] letter in the mail from their lawyers immediately .. should I then tell them to go sue you instead for selling it to me? Sell me [microsoft.nz](#) and we'll try it shall we?

I do not want people making similar websites to mine to use for phishing or scamming or passing off or any other fraudulent usage .. and I do not want InternetNZ making money by selling a similar piece of intellectual property similar to what I already own. I am already upset that the internet has become a money making sh#tfight for rent seekers like domain names sellers when in the past you could do a lot of things entirely for free.

My legal adviser has suggested I refer you to these points:

1. **Breach of Consumer Expectation:** Emphasize that InternetNZ marketed these domains with the implicit promise that purchasing a [.co.nz](#) or [.org.nz](#) domain provided exclusivity without the need for a [.nz](#) option. Introducing similar domains now could easily mislead the public and erode the value of existing domains like yours.
2. **Consumer Rights Violation:** Argue that creating a [.nz](#) domain undermines the rights of initial purchasers by introducing unexpected competition, a practice that may infringe on fair trading standards. Emphasize how this goes against typical consumer protections where customers are given clarity on exclusivity before purchase.
3. **Market Confusion and Security Risks:** Stress that the release of similar [.nz](#) domains risks market confusion, potentially leading to "brand dilution" and end-user frustration. Mention that it also opens doors for phishing attacks or fraudulent use, with consumers potentially being misled by sites mimicking legitimate businesses.
4. **Comparison with Trademark Principles:** If relevant, mention how trademark laws protect brand distinctiveness. Assert that InternetNZ's policy lacks this foresight by allowing similar domains that diminish the unique identity of domains like yours, potentially damaging your brand.
5. **Moral Appeal:** You could add a line expressing disappointment that InternetNZ has shifted from being a tool for connectivity and innovation to one that increasingly appears focused on revenue at the expense of user trust and safety.

It all sounds like what I just told you in everyday language but in legally polite language but without a big [\[redacted - language\]](#) included.

I am at the point where I just want to say [\[redacted - language\]](#) and tell InternetNZ to create something of real value for us or shed some staff and lower the prices we pay for what we have already.

If I have to sue InternetNZ I am sure your "profit" figures will not look so good in your next annual report. Currently, you appear to have a monopoly in issuing domain names in NZ .. this should be investigated.

I have already told InternetNZ what I think for about 3 years regarding the [.nz](#) domains similar to mine and they are all in a conflicted state. I expect them to stay there FOREVER for the same reasons I have told you since you first suggested this scam. You have created conflicted domains and want me to pay to or fill out paperwork all the time to solve the problem you created. [\[redacted - language\]](#)

Paul King

[\[redacted - privacy\]](#)

ps. I already get emails for King's Plant Barn by mistake because they have my email address on their voicemail ... I do not want another whole crop of cr#p emails to answer or ignore because InternetNZ want to create for a few pieces of silver for themselves and create more confusion.

pps. I hope everyone who reads this can sense I am extremely annoyed. If you can't I expect you work in the Public Service.

Submission # 25

Received: 02/11/2024

Submitter: Karaitiana Taiuru

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No. Please see general comments.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

Please see general comments

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

-

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.

Yes

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Asking Māori (I would suggest anyone) to pay a \$1000.00 fee for a repatriation of a taonga will attract further criticism. Governments and museums pay for repatriation of physical taonga. InternetNZ should do the same to be in line with a Te Tiriti-focused

6. Please provide any general comments on the approach.

IntertnetNZ principle ‘te reo Māori me ōna tikanga’ is ignored in the consultation document, as are the principles of Te Tiriti, regarding the description of kupu Māori names.

InternetNZ made this same mistake in 1997-2001 by assuming only Iwi are representative of te ao Māori/Māori communities with domain names.

This consultation document assumes that hapū (Tiriti partners), whānau and Māori organisations (domain name holders and the majority in the .nz space) are somehow less important than iwi. The dot maori dot nz consultation documents and vote highlights my points.

It could be perceived that InternetNZ an acknowledged racist organisation is perpetuating its lack of knowledge and telling Māori what is tikanga without proper consultation among Māori stakeholders of culture, reo Māori and Māori Internet stakeholders. Instead choosing a few groups that have no vested national interest in the DNS.

This lack of tikanga is offensive and ignores the widely used principle - Tapu versus Noa. This principle should have been considered for this consultation to make it more culturally safe. It is likely that many Māori who have the skills to contribute, will not engage.

Regarding Māori words. InternetNZ must also consider:

1. How it identifies a kupu Māori. The recent DIA baby names highlighted this issue that phonetic words that are not Māori are being used as Māori words, or have been adopted as new Māori words by small communities.
2. Thousands of Māori words are in modern New Zealand English language and appear in dictionaries.
3. The Intellectual Property Office of New Zealand Māori Advisory Committee have seen a recent introduction of Māori words used as English words to avoid profanity and for marketing purposes.
4. Abbreviations of Māori names and organisations.
5. There are already several lists of tapu names that could be used that are not mentioned.
6. Future protection of taonga Māori in the DNS. Lists are an organic base and should be treated as tapu.
7. As InternetNZ do not monitor content, there is another layer of complexity for online abuse and racism. We have seen many examples since 2000 and many were in the media.
8. Rangatiratanga of Māori names of collectives.

Expert Group

1. "suitably qualified experts will be appointed by InternetNZ" Again, InternetNZ have a long documented history of choosing certain people who will meet the expectations of various Council and members. Again, this has resulted in many Māori issues including this consultation. I would suggest transparency with appointments detailing why they were appointed and that appointments have credibility in the communities they represent, to avoid the so-called 'boys club' mentality that was raised in the racism investigation.
2. Membership should consider the structure of the IPONZ Māori committee which has 5 independent experts in various aspects of Te Ao Māori. Decisions are made by consensus, there are no votes etc. All members have a high level of authority in te ao Māori.
3. The group would require at least one Māori language expert. The likely choice would be with InternetNZ's strategic partner Kōhanga Reo.

ENDS

Submission # 26

Received: 03/11/2024

Submitter: Trevor Slattery

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

-

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

-

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

-

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.

-

5. What are your views on the level of the proposed determination fee being set at \$1,000?

-

6. Please provide any general comments on the approach.

"Ex-Conflicted Domain Names For Release will be released for general registration under a process administered by the .nz Registry at its absolute discretion." This is as bad as the Government confiscating Māori land and then NOT at least giving Iwi first right of refusal to buy it back.

I put it to you, that if a .nz domain was available to register at the time I registered the .co.nz, then I would have clearly done so, shorter names being obviously preferable. To be "conflicted" because someone else registered a variant many years later seems at odds with the policy of first come, first served. I submit that conflicted domains should have followed tikanga with a mana whenua-type approach of offering to historical claims first.

Submission # 27

Received: 04/11/2024

Submitter: Matt Brown

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

Overall yes, but as discussed below I do not understand why the two exceptions proposed are required, as both situations should already (and are better suited) to be covered until the top-level principles, and procedures rather than introducing another set of exceptions.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

The timeframes are reasonable.

The overall steps are reasonable, but the two proposed exceptions are not sufficiently explained or justified for why the complexity they introduce is required - both situations should be adequately covered under existing top-level .nz rules and procedures.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

No.

The rationale and need for this exception is not explained in any level of depth in the proposed schedule, and the high-level description given on the consultation webpage argues against the need for the change by noting that the level of potential harm is not significant.

Conflicts between domains (even those belonging to "famous" or government websites) is nothing new, and is nothing special in terms of 2LD/3LD considerations - and indeed the organisations likely effected are the best resourced and most capable of managing any risks they face from this process.

Carrying an exception on this type forward only adds costs and complexity to the final resolution process that does not seem justified or warranted based on the information given.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

No.

The rationale and need for this exception is not explained in any level of depth and I am unaware of any similar concerns being raised at an earlier state in the process.

Supporting the .nz principles should be adequately achieved by the top-level .nz rules and procedures without the need for special-case exceptions of this type - if there is some reason why the overall .nz rules and procedures cannot give adequate effect to the principle here then those should be fixed at the top-level.

5. *What are your views on the level of the proposed determination fee being set at \$1,000?*

My general concern as noted above is that these exceptions add unnecessary complexity to the process - if the determination fee is expected to recover the costs of that unnecessary complexity it seems wholly insufficient, being unlikely to even cover a few hours of effort of a panel of experts.

6. *Please provide any general comments on the approach.*

I'm supportive of the long-overdue resolution of the conflicted name process in the interests of simplifying management of the .nz space - achieving that objective should not be muddied by the last-minute introduction of yet more exceptions and complication that will then continue to add complexity and detract from the overall intent of policy 2.1 going forward.

The purpose of finishing conflicted names is to return *all* names back to management under the top-level policies. If there is discomfort or lack of trust in those policies to achieve those goals, then the answer should be to fix or improve the top-level policies in general, not carry yet more exceptions forward.

Submission # 28

Received: 04/11/2024

Submitter: Gerad P Fitzgerald

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

[redacted for privacy/sensitivity]

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

overly legalistic and bureaucratic.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

yes

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

yes

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Excessive. Seems intended to knock some competing claims out to create more "last man standing" situations). I won't use expert determination because of it even though I would like the owner of the competing 2nd-level domain name to engage/consult with me (still hasn't)

6. Please provide any general comments on the approach.

On the basis of first come first served, I should have rights to the *[redacted for privacy/sensitivity]* domain. I would have liked the other party/parties to respond and consult, but hasn't happened. They should lose their right to claim the shortened domain name.

Submission # 29

Received: 04/11/2024

Submitter: John Hanna

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

Not entirely because I do not understand what supporting te reo Māori me ōna tikanga means in relation to domain name policies or domain name policy conflict resolution.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

Hanna & Associates is the holder of a conflicted domain ([redacted for privacy/sensitivity]).

From what I have read, it is not clear the me whether we will be notified if or when either of the other 2 domain name holders in the conflict ([redacted for privacy/sensitivity]) relinquish those domain names.

Is there a process whereby the last standing domain name holder in a conflicted domain name set is notified, prior to the .nz suffix being released to the public?

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

What are the criteria that makes a person a "suitably qualified expert" to be appointed by InternetNZ to determine applications under the exception process?

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori ' is reasonable? If not, please explain.

I do not know what this means.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Is the figure of \$1000 based any equivalent dispute resolution administration fee? i.e. To lodge a claim of less than \$2000 in the Disputes Tribunal costs \$59.

6. Please provide any general comments on the approach.

When Hanna & Associates registered the domain, [redacted for privacy/sensitivity], in 1999, if [redacted for privacy/sensitivity] had been available we would have registered it.

We have previously responded to InternetNZ that if the [redacted for privacy/sensitivity] domain name becomes available we would register it.

However, our company finds itself in the position whereby an individual (*[redacted for privacy/sensitivity]*) registered *[redacted for privacy/sensitivity]* in 2007, and a regional health organisation *[redacted for privacy/sensitivity]* registered *[redacted for privacy/sensitivity]* also in 2007.

After reading everything I have received from InternetNZ to date, it remains unclear to me how the 38-year-old business name of Hanna & Associates is being protected in this conflicted name resolution process.

Submission # 30

Received: 05/11/2024

Submitter: Nicholas Lee

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

I think any conflicted domain should be offered to the oldest holder of a domain first.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

-

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.

-

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Probably put off most domain owners.

6. Please provide any general comments on the approach.

-

Submission # 31

Received: 09/11/2024

Submitter: Ben Bradshaw

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

The Conflicted Names process has been a long-running process where I have engaged in good faith despite comments from staff at Internet NZ that I may lose the ability to register my conflicted domain if I do not participate.

For the effort I have put in I have had zero success in securing a domain that I have an obvious interest in. The other party has not engaged at all and therefore I am at a loss to explain why I don't get the preferential ability to register the domain. I feel like I have wasted time engaging with this process and if I had let it just play out I'd be in the same position.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

As noted above, the general release of domains where one party has shown engagement with the process and the other has not is disappointing. The timeframe is fine.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Yes

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

How you choose to handle those domains does not impact me so I have no opinion.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

For personal users, this may be a large cost. For a business, I don't think they'll much care about \$1000.

6. Please provide any general comments on the approach.

The link to <https://internetnz.nz/nz-domains/nz-policies/nz-rules-2023> does not work in this form - it should redirect to the 2024 rules.

The overall level of updates specifically for this process for people who have participated has been low.

Submission # 32

Received: 15/11/2024

Submitter: Kirk Jackson

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No, it favours more technical domain holders with the ability to grab the domain as soon as it's released. This conflicts with the "Open and accessible" principle.

I recommend a ballot with a random choice among conflicted with a right of refusal.

An alternative would be to prioritise in some deterministic way - e.g. favouring .co.nz or the domain registered the longest.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

I agree with the timeline, just not the release process at the end.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Yes. All conflicted holders should be given the opportunity to lodge a security risk.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

Yes

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Too high. Our conflict is between a family and a corporation. \$1000 is unreasonably high to expect a private citizen to pay.

6. Please provide any general comments on the approach.

-

Submission # 33

Received: 16/11/2024

Submitter: Jeffery Jones

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

NO Comment

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

Not sure

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Reasonable

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.

Treat everyone the same

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Expensive unforeseen expense for existing domain owners.

6. Please provide any general comments on the approach.

IN FAIRNESS: New .nz domains should be offered to the domain holder with the earliest registration. I purchased my .co.nz domain after it was first registered on 17/03/1997 believing it was the prime domain name in the string. The creation of .nz domain names was not ever considered at the time, I believe in fairness the .nz domain should be offered to the owner of the first registered domain in the string and if declined it should be offered to the next registered domain owner in the string and if declined it would be offered to all domain owners in the string in line with the dates of their existing domain registrations until all owners have been offered the .nz domain and only after that point it should be open to the market for registration.

Submission # 34

Received: 17/11/2024

Submitter: Brent Cooper

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No! The proposed process for applying for determination with a \$1,000 application fee is in contradiction with .nz Rules 2.1.1 which says that "Any available domain name can be registered on the .nz Register on a first come, first served basis in accordance with these .nz Rules."

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

Over the past 10 years we have provided multiple submissions as to the fact that NZJF is the representative body for judo in New Zealand and make the case that the NZJF is justified in obtaining the right to register judo.nz. We have never received any feedback or any kind of contact other than being invited to participate in yet more repetitive surveys and submissions. Now we have yet another proposed process without any consideration given to passed submissions where the proposal is simply an attempt to, in the first instance, have conflicted parties \$1,000 for the (not guaranteed) chance to obtain registration rights and in the second instance, just to walk away from making any decision to resolve the conflict and leave it to whoever is able to click mouse buttons quicker. This is not a resolution process!

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

NO! Because there are been multiple surveys and and submissions made over a 10-year period that should provide sufficient information from all parties in conflict such that a resolution decision can be made. That you have not made such decisions means that you have wasted the time and efforts of those making decisions and have not upheld the responsibilities you undertook. This proposal is obviously to see if parties are prepared to buy a decision and if not simply walk away from the responsibility you have undertaken to provide conflict resolution.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle 'nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

yes

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Rather than look at claims on their merits, the suggestion is to award the right to register a domain based on which party is prepared to pay \$1000? That is disgusting and that is NOT a conflict resolution process!

6. Please provide any general comments on the approach.

InternetNZ has had 10 years to resolve conflicts, it has received multiple submissions still in conflict and it has chosen not to make decisions. This has resulted in nothing but wasted the time and effort on the part of submitter submitters. Now InternetNZ wants conflicted parties to *buy* a resolution? This reeks of 3rd world level incompetence and corruption.

Submission # 35

Received: 20/11/2024

Submitter: Loretta Roberts

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

Yes

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

I just hope that this time around there is a resolution as the last time there wasn't.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Yes

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

Yes

5. What are your views on the level of the proposed determination fee being set at \$1,000?

I think it is a bit steep.

6. Please provide any general comments on the approach.

Submission # 36

Received: 21/11/2024

Submitter: David Teskey

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

A .nz Domain Name should be allocated to an applicant who has a New Zealand registered company with the name applied for in the application

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

A .nz Domain Name should be allocated to an applicant who has a New Zealand registered company with the name applied for in the application. As an example - name applied for is [redacted for privacy/sensitivity]. We have a registered NZ company in the name of [redacted for privacy/sensitivity], NZBN: [redacted for privacy/sensitivity].

Time frames are OK

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Yes

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

Yes

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Too high - should be under \$500

6. Please provide any general comments on the approach.

The fact that an applicant has a NZ registered company specifically in the same name as the .nz name application should be a compelling reason to approve that application.

Submission # 37

Received: 22/11/2024

Submitter: Michael Moffatt

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

I don't have a particular opinion on whether it is consistent, but I think the outlined approach is reasonable.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

They are reasonable.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

It is reasonable as long as not overzealous or automatically determined.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

I don't understand how the exception to general release relates to the cited principle. The consultation webpage might have done a better job to explain the context here. Does it mean that Iwi with conflicted domains won't have their domains as part of the general release (this sounds fine to me)? I don't know, the explanation provided no context on the problem being solved.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

That is really steep and prohibitive for non-commercial domains (like mine).

6. Please provide any general comments on the approach.

In general it sounds fine to me.

Submission # 38

Don Stoke - Email received 26 November 2024

My general observation is that I think the "keep it conflicted" option is unnecessary and over-complicated. Rather, I think it would be better if all names were either released, or assigned to one of the conflicted users, and that the dispute resolution process be extended to allow that for cases where the petitioner requests assignment for "public good" or "security" reasons rather than the usual rights reasons.

This applies to names claimed for both Māori tikanga reasons and for security reasons.

I think it is a poor idea to have names blacklisted. INZ should not be taking responsibility for other organisations' security requirements; if a conflicted name needs to be secured, there should simply be a path by which a responsible agency can obtain registration for the name. That way if the need to have a name blocked from registration goes away, the name can be relinquished by the registrant, and there is no need for INZ's ongoing involvement.

I don't think such dispute resolution should be any different to any other type of dispute resolution in terms of process and financial barriers.

Submission # 39

Received: 26/11/2024

Submitter: Vanessa Sharp

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

Yes

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

Timelines and process are reasonable

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Would like to understand further what would be accepted as a significant risk of harm and how this is determined.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

As an entity located outside of New Zealand we have no comment on this.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Seems reasonable

6. Please provide any general comments on the approach.

Seems a reasonable approach to bring the process to an end

Submission # 40

Received: 26/11/2024

Submitter: Alan McIvor

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

Yes.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

The problem all along that I have encountered is that the owner of the other conflicting domain has refused to participate in any of the attempts to resolve the conflict offered to date. If the other party continues with this stance, then it seems my only options are to pay the application fee on 5 August and hope that the determination is in my favour, or wait till 30 September and hope that I can secure the top-level domain in the lolly scramble. The holder of the other domain has the same rights as me. Because of his non-participation, he should be bared from being able to register the top-level domain, especially as he appears to be no more than domain squatter and is not a NZ resident.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Yes

4. Do you think the exception to general release where it is inconsistent with the .nz Principle 'nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

Yes

5. What are your views on the level of the proposed determination fee being set at \$1,000?

As a private individual it is a huge cost.

6. Please provide any general comments on the approach.

If one of the other conflicted domain holders has refused and continues to refuse to participate in any resolution process, then the approach results in a totally random resolution that does not give other participants who have held their domains for a long time any preferential treatment.

Submission # 41

Received: 26/11/2024

Submitter: Simon Ritchie

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No!

I understand that there is no requirement in the .nz Rules that a domain name needs to currently be being used - whether that is for a website, or be used to communicate information (mail servers), or to facilitate commerce (APIs).

But I feel the claimed entitlement to the .nz domain by a company holding the longer domain names (eg .net.nz) but which has no intention of using those domains or the relative shorter domain names other than just wanting to own them solely to sell the ownership at an inflated price just to make money is wrong and goes against the basic principles of internetNZ? In particular the second of the .nz Rules principles:-

".nz should be open and accessible: everybody should be able to observe, participate, innovate and enjoy the benefits of .nz"

This is a general point but the conflicted names process appears to encourage this unsatisfactory behaviour

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

-

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

-

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

-

5. What are your views on the level of the proposed determination fee being set at \$1,000?

-

6. Please provide any general comments on the approach.

In general, I believe InternetNZ should discourage the ownership of domain names for speculative investment. The proposed process for dealing with conflicted names seems to encourage this unsatisfactory practice.

Submission # 42

Received: 27/11/2024

Submitter: Prudence Malinki

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

Yes

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

We appreciate the creation of a process to finally resolve the ongoing conflicted domain names issue. The time line is ambitious, but very timely and we support the endeavour to have this resolved prior to the end of 2025.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

In principle the exception process is reasonable, and the examples relating to technology are very helpful for context, however the threat to security relating to impersonation is not limited to solely technological entities and there are adjacent sectors and industries that also are likely to undertake impersonation upon wrongful application. Although we appreciate the principle of "first come first served" there should also be a caveat as to what constitutes acceptable use and there should be efforts made to minimise wilful perpetuation of impersonation by unauthorised nefarious persons.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

This is reasonable. I again want to take the opportunity to applaud your stance, efforts and actions relating to inclusivity and protection of the Māori people and we wholeheartedly support these principles that you have created to further this endeavour.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

Please ensure that where referencing the "\$" sign that you are also mentioning that you are not referring to USD (for people who are making wrongful assumptions like me)! Also in light of the NZD price tag, this is very reasonable and also very in line with your inclusive approach and overall ethos- and we support this too. Accessibility to a process like this will be pivotal in it's success and its use, so this price-point is good, not too high, but high enough to support the allocation of expert panelists.

6. Please provide any general comments on the approach.

Once again InternetNZ is paving the way forward with policy efforts and endeavours. The timeline that is actually timely, and the creation of a exemption process which is accessible is applaudable. The active engagement of the community to ensure that you have received feedback, and the willingness to obtain and review the thoughts and comments of the community is appreciated. Markmonitor supports your suggestions to resolve the existing conflicted domain names and to create either a permanent list of domains to not register or to allocate the domain names accordingly.

Submission # 43

Received: 27/11/2024

Submitter: Stephen Barfoot

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No. The recommended approach is inconsistent with the following 'guiding principles':

- .nz should be secure and trusted: .nz infrastructure must be dependable and secure, and .nz be trusted; and
- .nz should enable New Zealand to grow and develop: it should help people, businesses and organisations connect, create, innovate and grow.

InternetNZ's stated belief is that the potential for harm (arising from domain name confusion) from the release of the conflicted domain name is not significant. We disagree. A general release to the market of conflicted domain names creates a real and tangible risk, in relation to each conflicted domain name, of:

- competitors seeking to undermine or 'pass off' their goods or services with those of their competitors who hold legitimate, and earlier, rights to similar domains;
- other malicious actors seeking to mislead, deceive, scam or otherwise harm New Zealand and other consumers by using domains similar to trusted domains and brands;
- "squatters" acquiring .nz domain solely for the purpose of generating a profit by on-selling the domain, including to competitors and/or malicious actors;
- third parties (including potentially non-New Zealand parties seeking to displace a local brand) with no prior interest in a conflicted domain name obtaining rights in that domain name in priority to parties who do have an established interest solely by virtue of having the 'fastest finger' (or more realistically, the most efficient automated software) to register the domain when it is released; or
- some combination of each of the above.

There is also a risk of harm to international consumers with a lower degree of familiarity with New Zealand brands, who are more likely to be misled, or be susceptible to passing off, of one domain as another established domain.

Rule 2.1.1 ("first come, first served") has not been applied in a consistent manner in relation to conflicted domains. While the rule has prevented the potentially harmful release of conflicted domains to date, reverting to a "first come, first served" practice after significant delays, and without taking into account the parties' positions and participation in the existing process(es) over the last decade, risks compounding the potential harms.

Rule 3.1 requires that "InternetNZ must ensure that it consults with anybody affected by the proposed change before making final policy decisions". To date this has

involved several steps, including this submission process and recently a survey of interested parties. Of the four options to resolve the conflicted domain set, the proposed rule change appears to have been the least popular option, behind permanently locking the shorter domain, maintaining the current method, or allocating the name randomly.

There are a range of superior options which do not carry the same risks and comply with InternetNZ's rules and principles, which have not been given adequate consideration or appear to have been dismissed in favour of InternetNZ's preferred option, including those discussed below in our 'general comments'.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

The current process has already been lengthy and time consuming. However, the process to date has at least not resulted in a potential release of the .nz domain without a suitable resolution or placement with a suitable registrant.

In 2015, Property Page submitted to the DNC on behalf of the organisation that Property Page wished to register a specific domain.

There were four other domain name holders that had submitted and registered an interest in the .nz domain.

In 2020, Property Page engaged with the DNC Conflict Resolution Facilitator. However, the .nz domain name remained conflicted due to one party with an 'interest' that refused to engage in the dispute resolutions process. Since then, there has been no progress in resolving this issue. It is highly unlikely that there will be a resolution during the notified final period of resolution without improvements to that process or an alternative (and fair) method of resolution, as proposed below in our general comments.

A general release to the market is unfair to those that have taken part in the initial resolution process in good faith, who could now lose out in favour of parties who did not engage in the process, or who have no established interest or rights in the domains. Further, the exceptions proposed have not been adequately explained and fail to consider important issues such as passing off or confusion in the marketplace.

There has not been any information as to how domain name squatters will be considered under this consultation. If a party to a conflict refuses to take any action or take part in the conflict resolution processes for over a 10-year period, then it is in the interest of justice and practicality, to first offer the .nz domain to the party with an active interest as opposed to a general release.

Further, the relatively short timeframe serves to grant significant leverage to domain name squatters who are part of the conflicted set, who are now empowered to demand a higher price for their domains from legitimate users wishing to avoid a general release. Accordingly, a longer time period for resolving the remaining conflicts would be beneficial to legitimate users.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

No. The explanation behind the 'security exception' is that some conflicted domain names carry potential risks of harm due to impersonation.

However, the implementation is unclear and ignores the potential for harm from the proposed approach as a whole. The security exception is stated as "includ[ing], but [...] not limited to, domain names that are descriptive of famous brands [...] where there is significant risk of harm".

No criteria for 'famous brands' or 'significant risk of harm' has been provided. Without clarity on what the exceptions will actually cover in practice, it appears there is a real risk that the exception will apply only to government websites and very famous technology brands as stated. This is unlikely to offer any protection to even well-known New Zealand traders while granting special protection to overseas companies.

Without published criteria, it is unclear whether our brand and website, which are both well-known in New Zealand, would qualify for the security exception. The process and effects of the process are fundamentally uncertain.

Further, legitimate traders who have already registered their legitimate interest in conflicted domains should not be put to further time and expense in evidencing their reputation and rights in the conflicted domains, especially where it is unclear whether that that expense will result in a determination that favours the trader over squatters and malicious third parties.

The security exception should be applied equally to all brands and businesses in New Zealand where there is a risk of impersonation or "passing off", and clear proposed criteria should be published so that parties can give informed input on the scope and method of applying the exception.

At very least the exception should cover websites relating to financial matters, financial transactions, and where a high degree of trust in the information presented is necessary and desirable.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

No view.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

No view.

6. Please provide any general comments on the approach.

To properly meet the principles and/or rules, Property Page proposes that superior approaches for resolution include (but are not limited to):

1. Assigning the .nz conflicted domain name to the first registrant of an earlier domain name which has placed the domain into conflict. Using the example on InternetNZ's website, if jobloggs.net.nz was registered to Joseph Bloggs before jobloggs.org.nz was registered to Joanna Bloggs, then the conflicted domain name jobloggs.nz should be offered to Joseph Bloggs first, then to Joanna Bloggs if Joseph Bloggs refuses that offer, and finally to the public if neither Joseph nor Joanna wishes to register the domain name;
2. Assigning the conflicted domain name to the registrant of an earlier domain name who is likely to make the best use of the domain, for example by excluding holders of earlier domains which are not (and/or have never been) actively used for any purpose from consideration;
3. Utilising the current resolution process with the addition of deeming that any party who refuses or fails to engage substantively in the process is not interested in obtaining the conflicted domain name and removing those persons from the conflicted set;
4. Maintaining the current conflicted domain process. According to InternetNZ's own materials, the number of conflicted domains continues to drop over time. While the rate may have decreased that is not sufficient reason for InternetNZ to abdicate any responsibility for a fair resolution where the true issue is a failure of certain parties to engage in the process;
5. Permanently locking the conflicted domain unless or until a resolution can be reached.

Of the alternative options presented in InternetNZ's survey on the proposed rule change, several of these options (and all options presented) appear to have been more popular than the process InternetNZ appears determined to implement.

Property Page suggests that of these, option 1 is the superior option (including being superior to the proposed approach) as it:

- complies with the principles by ensuring that:
 - the registrant of each conflicted domain is a party who has operated a .nz domain for a significant period of time without substantive issue and accordingly is (and their use of the domain is) likely to be "dependable and trusted [and] secure"; and
 - each domain can be used by New Zealanders to grow and develop instead of stagnating as, at best, a 'squatted' domain, or being used in an actively harmful manner by malicious actors.

- complies with rule 2.1.1 by ensuring that the “first come, first served” method as applied recognises the historical expressions of interest already made;
- achieves InternetNZ’s stated goal of ending the conflicted domain name process promptly; and
- was supported by a significant proportion of survey respondents in free text responses, without being presented as an option by InternetNZ.

Submission # 44

Received: 27/11/2024

Submitter: Jonathan Short

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No. You say you operate on a first come first served basis but as someone who has held a now conflicted .co.nz name for many years, having been first to register the name by 12 years does not serve me.

The single conflicting domain owner refused to bid in negotiations and now I am faced with having my domain trumped by a .nz domain if I am not available to be first to register it the moment it becomes available.

This is a situation you have created, first by not releasing .nz domains from the start and now by insisting the higher level domains all be made available.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

Ending the conflicted names process by forcing such names into allocation is a process of creating losers. Lower level domains are largely equal, the .nz domain trumps them all.

I would ask what is wrong with allowing .nz names to remain conflicted?

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Yes.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle 'nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

No. Why bring race into this arena? This ongoing pretence that Māori are disadvantaged and require special treatment is insulting and unnecessary.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

\$1000 seems reasonable.

6. Please provide any general comments on the approach.

At the risk of repeating myself, I would ask why you are so hellbent on making all the .nz names have owners?

If someone wants or needs a certain .nz domain enough, they can approach the owners of the other domain(s) and negotiate.

You guys created this situation by releasing this top level domain.

Don't get me wrong, I'm glad you did but this business of forcing all the names into someone's (anyone's) hands creates a number of disadvantaged domain owners for no good reason that I can see.

In cases where the domain is popular and many second level names are registered, this process is going to create a single winner and many losers.

What is the point in doing that?

Submission # 45

Received: 27/11/2024

Submitter: Atarau Hamilton

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

Yes

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

I think its completely reasonable, it upholds the tikanga of process and impedes only slightly on the ability for those who would be first to make this a personal issue.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ‘.nz should support te reo Māori me ōna tikanga and participation in .nz by Māori’ is reasonable? If not, please explain.

Yes this is absolutely reasonable as long as the use of any resource is being utilised in Aotearoa then there is a first right authority, this again keeps sanctity and safety of our Taonga. More than just words, there is meaning behind it all

5. What are your views on the level of the proposed determination fee being set at \$1,000?

i am comfortable with this

6. Please provide any general comments on the approach.

-

Submission # 46

Received: 27/11/2024

Submitter: Jonathan Brewer

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No comment

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

Steps and timeframes seem sensible.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

Without understanding better the types of domains that would be considered harmful to the community it's not possible to support this exception.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle ' .nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

Without a detailed explanation of the Māori kupu being considered it's hard to support this exception.

5. What are your views on the level of the proposed determination fee being set at \$1,000?

It seems unfair that one party is responsible for the entire fee.

6. Please provide any general comments on the approach.

There is a risk of misinterpretation where common te Reo words have been registered as .co.nz and .net.nz domains in ASCII to conflicted parties, and one party has later registered the IDN version of the name at the 2nd level. In my opinion this later registration should have been prohibited as it was designed to circumvent the conflict resolution process. Conflict resolution for the ASCII version could lead to one party having an ASCII version and another an IDN version of the same name at the 2nd level.

Submission # 47

Received: 30/11/2024

Submitter: Oliver Lineham

Submission:

1. Do you agree that the recommended approach is consistent with the .nz Rules principles? If not, please explain.

No. The proposal conflicts with the .nz Principles:

Reduces trust in .nz: by adopting an unfair process for its own convenience, trust in InternetNZ as a trustworthy competent ccTLD operator is reduced.

.nz should serve and benefit New Zealand: New Zealand is harmed by forcing thousands of defensive registrations by existing name holders. The benefit is largely to InternetNZ's bank balance and convenience.

2. What are your views on the key steps to end the conflicted names process and the timeframes to complete them?

There is no justification for this process at all.

A self-serving view that "more registrations is inherently good" has been adopted. This is false. Defensive registrations are not good, they are simply a financial drag on New Zealanders.

3. Do you think the exception to general release for security reasons is reasonable? If not, please explain.

This is a cynical attempt to placate the most prominent name holders.

Big brands etc aren't the only ones at security risk from these registrations: were all are. Smaller brands just aren't likely to be able to shame InternetNZ in the media for doing this.

4. Do you think the exception to general release where it is inconsistent with the .nz Principle 'nz should support te reo Māori me ōna tikanga and participation in .nz by Māori' is reasonable? If not, please explain.

-

5. What are your views on the level of the proposed determination fee being set at \$1,000?

This is a problem of InternetNZ's making so it should pay for it.

6. Please provide any general comments on the approach.

When 2LD registrations were opened InternetNZ received an immediate, massive, and permanent increase to its revenue. It can be seen in the annual reports: it is millions of dollars per year.

The least it can do is be fair and continue to operate the conflicted name process.

If the technology of the conflicted name system is really that inconvenient, it can be shut down and done manually. The number of conflicts and rate of change is now so low it would not be onerous.

I'm deeply disappointed in the level of selfishness and disregard for name holders that InternetNZ has shown throughout this process.

Submission # 48

TE MĀTĀWAI - Email received 5 December 2024

Alignment with the .nz Rules Principles

Te Mātāwai was established by Te Ture mō Te Reo Māori/ Māori Language Act 2016 where the Crown "recognises the detrimental effects of its past policies and practices that have, over the generations, failed actively to protect and promote the Māori language and encourage its use by iwi and Māori (refer Section 6, Te Ture mō te Reo Māori 2016). The rules in place enable the facility to ensure no further detrimental effects on the mana/ status and value of the Māori language. Te Mātāwai supports the recommended approach, provided it maintains consistency with the .nz Rules principles, particularly the principle to support te reo Māori me ōna tikanga. Protecting iwi, hapū, and kupu Māori names aligns with these principles by safeguarding their integrity and cultural significance. This ensures that .nz remains representative of Aotearoa's unique identity and values

Views on Key Steps and Timeframes

We appreciate the proposed steps to end the conflicted names process and emphasize the importance of a robust and culturally informed framework. Specifically:

- Establishing a diverse and knowledgeable panel, with expertise in Māori language and tikanga, to oversee decisions.
- Ensuring adequate research and consultation to identify names that are significant to iwi, hapū, or Māori communities.
- Implementing clear, transparent timelines to allow meaningful participation and review.

Te Reo Māori Principle Exception

Ensuring iwi, hapū and kupu Māori names (including rohe) are used correctly in domain names contributes to the Māori Language Act's affirmation of the status of the Māori language as a taonga of iwi and Māori and a language that's valued by the nation. This approach respects the mana of the Māori language as a taonga and its role in representing Aotearoa on the internet.

General Comments

Te Mātāwai emphasizes the need for systems that:

- Prevent misuse or misrepresentation of iwi, hapū, and kupu Māori names.
- Incorporate macrons and other diacritical marks to ensure linguistic accuracy and to uphold the integrity of te reo Māori.
- Educate stakeholders about the cultural and linguistic significance of domain names.
- We also urge ongoing monitoring of the conflicted names process to identify and address emerging issues, ensuring it remains consistent with tikanga and the values of .nz.