

## **2LD Policy Review - Proposed New Policy Submission**

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I welcome the new draft policy. Overall I would say "well done" to those that have put it together. I do not wish to comment on the substance of the new policy as I cannot detect any serious problems. However, I do believe there are a number of drafting changes that may improve the document. A couple comments below also address minor detail of the policy. The following suggestions are all IMHO of course.

### **2. Background**

The SRS is irrelevant to this document but the Office of the DNC isn't. Beginning with "and maintains" in 2.1 the remainder of this section should be deleted. A new 2.2 should be added indicating the relationship of the DNC to InternetNZ - delegated responsibility for operation of ... etc.

### **3. Principles**

3.5 Why does a 2LD name have to be "small"? They started this way because storage was comparatively scarce and expensive. That is no longer true. Similarly automatic completion found in most modern applications means any objection to typing longer names is weak. I'm not arguing for long names, just that the explicit reference to "small" should be deleted.

3.7-9 I think these could be improved by starting with a positive version of 3.9, e.g.

3.7 Domain names may only be registered in the second level of the .nz domain name space in accordance with current InternetNZ policy. (Sections five and six of this document specify the current policy.)

3.8 Existing

3.9 Names in unmoderated 2LDS are available....

### **4. Selection of an Appropriate 2LD**

4.2 "are held" should be "is held"

## **5. Creation of New 2LDs**

5.6.4 The name issue again. I suggest "Use a name to represent..." rather than abbreviation and also drop "small" again.

5.6.6 Missing full stop

5.9 The last word should be "proposer" rather than "propose".

5.10 I suggest "...for discussion for a fixed period of public consultation." This defines "consultation period" in 5.14 as well as "public consultation" in 5.11.

5.14 insert consultation in "the consultation process". I also suggest the last sentence be put in brackets. It is more an observation for those used to the current policy than policy in itself.

## **6. Creation of Moderated 2LDs**

6.3 I don't really understand the purpose of 6.5. If the policy is trying to say that this information should be recorded about the moderating organisation then it belongs in either 6.2 (responsibilities of the community of interest) or 6.3 (outcome of reaching agreement). Similarly 6.3 is a good place to introduce "agreed number of working days". Much better than 6.4.3 and 5. I suggest:

6.3 A Moderation Agreement will be ...."moderator" or "moderating organisation". I think the agreement is with the organisation.

6.3.1 The moderating organisation will provide details including the full name of the organisation, the name and contact details of the contact person within said organisation, and the name and contact details of the designated moderator.

6.3.2 The agreement will set the maximum number of working days allowed for consideration of an application to register a name within the moderated 2LD.

This now makes 6.4 much easier:

6.4.2 Add "is acceptable to the moderating organisation".

6.4.3 "The moderator must ... within the agreed number of working days."

6.4.5 Can be deleted.

6.4.7 becomes 6.3.3 as it is part of "the agreement".

6.6 and 6.7 should be combined. Either by making 6.7 into 6.6.1 or by splitting 6.6, vis:

6.6 Where a domain name ... criteria for that domain:

6.6.1 The moderator can apply ...

6.6.2 current 6.7

6.8 operating principles

Is the second bullet needed? No where is it stated that NZRS is involved. Better wording for 3rd bullet, "Moderators will need to either be or become an established registrar..."

6.12 Suggest "... existing unmoderated 2LD to become moderated" and also suggest in

6.12.1 "All registrants of the 2LD must accept..." because it gives better emphasis to the "all".

## **7. Maintaining and Monitoring 2LDs**

The 7 is missing. Also the last sentence of 7.1 is clumsy. Maybe "... will be made without full agreement of the affected registrants". It doesn't explicitly mention consultation, but how else do you get full agreement? If we really need consultation then maybe "...will be made without full consultation with and full agreement of..."

## **8. General Information**

I assume this is policy about the maintenance of general information and not general information per se. The latter should not be in a policy. For the former I suggest "A range of current information about ... will be publicly available..."