

Second Level Domains Policy Review Submission

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1.

Q: Are the twelve second level domains still appropriate for their communities of interest?

A: Firstly, I am of the view that once a 2ld is there, it should stay.

Of the current 2lds, I have never had a problem with any already there.

2.

Q: Should any of the open 2LDs be moderated? (.ac, .co, .gen, .geek, .maori, .net, .org, .school)

A: yes

comments: .school.nz and .ac.nz, despite actually being unmoderated at the moment, does tend to give an appearance of looking official. The cat may be out of the bag and down the road as I once said, but I think closing them off to unmoderated registrations would send a clear signal what its intention was.

3.

Q: Is there any need for the rationalisation of the current 2LDs?

A: Again, I said in 1 that I do not favour rationalising any of the current 2lds, unless (once again) moderating .school.nz and .ac.nz counts.

3.1

Q: If so, what process should be used for the removal or closing of existing 2LDs?:

A: If we do find ourselves in that position, I'd like to see the process meaning all registrant rights protected until the last domain in [1] that 2ld (should it ever get that far) is deregistered, [2] registrations suspended then [3] further discussion before the deed is done, so to speak.

A third way could be to allow new registrations but not new registrants.

3.2

Q: Should any such process be included in the 2LD policy?:

A: Yes.

4.

Q: What criteria (types of criteria and specific examples) should be applied to the creation of new 2LDs?

A: I think the existing criteria provide a good balance between the frivolous applications, so I don't advocate much change there

5.

Q: Is the current process for creating new 2LDs too simple, too complex or about right?

A: too complex

comments: Most people I talked to during the .geek.nz and .maori.nz processes assumed after the first council vote they could get their paws on either domain straight away. Either the process needs to be publicised more, or one needs to simplify the process.

In that respect, I'd like to see one 'will we do it?' vote that will be final. There could be further votes at a further council meeting, but only for implementation matters. [*]

[*] I'd put in a derider here, 'exceptional circumstances' or new evidence (i.e. fraud, etc) coming up that may affect the basis on which the application was judged.

6.

Q: How much, if anything, should an application for the creation of a new 2LD cost?

A: NZD1000 seems to be a modest sum to prevent 'silly' applications that may pop up from time to time, yet allow serious applicants to proceed. Raising it more would be nice to cover costs, however.

7.

Q: Who, if anyone, should be able to block the creation of new 2LDs? If so, why and how?

A: I think objectors' concerns should be enough during the consultation process, though I think they should be encouraged to note clearly in any submissions they make that they find it offensive, or whatever, and why.

This process could also be used for people to object to their 2ld being possibly confused with a possible new one, i.e. .com.nz vs .co.nz or .govt.nz vs .govt.nz, etc.

8.

Q: Should there be different criteria or processes for the creation of moderated as opposed to open Second Level Domains?

A: Yes. For example: if .maori.nz had been moderated, as I recall it was briefly discussed, I would have demanded more detail in the processes that would have been put in place for it.

9.

Q: Is the level of public input in the process adequate; excessive; or inadequate?

A: inadequate

comments: I realise it's hard to publicise such a dry topic, but one can only but try. At least there's multiple opportunities to provide input.

10.

Q: Are the methods currently used to seek public input (submissions; discussion period; straw poll) the best available, or would you suggest other/additional methods?

A: While it's cumbersome and rather drawn out, I agree that the current 2ld process it does give multiple opportunities to contribute as per what I said in 9.

11.

Q: Do you think direct public registrations should be accepted at the second level?

A: no

11.1

Q: Why? What are the advantages or disadvantages of such an approach?

A: My main concern is people registering similar 2lds to .co.nz (.com.nz, .corp.nz) and then trying to sell registrations there. Too much confusion and mayhem, I smell.

I'd like to see maybe some limits to prevent these things happening. But of course one can't limit registrants' rights to subdelegate any domains they have to someone else.

12.

Q: If direct registrations are allowed at the second level, what kinds of transition arrangements would need to be put in place for existing third level registrants?

A: I suspect the best way is to open up to open slather. As for my answer to 11, my first gut feeling is that I think the best way to prevent .com.nz to be registered would be to only allow registrations of domains at the second level where the domain is 4 or so characters or more.

Alternatively, for non-colliding registrations, an idea: maybe those could be reserved for 30 days, while waiting to see if they want it.

13.

Q: What is the best way to deal with any conflicts between existing third level registrants if the second level is opened?

A: Well, if they don't agree, maybe open slather. Alternatively, one could see a simple drawing lots system.

I'd like to see off any auctioning or tender system if we can.

14.

Q: Should registration fees be different (higher/lower) for Second Level domain registrations if they are opened directly to the public?

A: Personally, I think there should be, as the 2ld levels are effectively devalued in some way. However, I also see advantages in having a uniform (registry) pricing system for all domain names, though we can't be sure domain registrars will charge less, same or whatever for 2ld registrations. :)

15.

Q: Are there other options around the future of the Second Level that the working group should consider?

A: Personally, I see no value in opening up the 2ld space at this time. The 2ld system appears to have served .nz well, with little complaint as we (appear to) have a transparent creation process at the moment.

16.

Q: Are there any other issues you think the Working Group needs to consider in the course of the review?

A: I think the working group need to come up with options on macrons in domain names; it's more of a technical issue, but with Te Reo Maori's influence growing in ICT and education, as well as life generally, we need to avoid those umlauts as much as we can. ;)