

Second Level Domains Policy Review Submission

From: Jacob Doherty
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1.

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

A: No.

.net, .school, .ac, and .org are all used inappropriately, however this is in line with say the gTLDs (eg .com, .net, .org)

2.

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

A: yes

comments: .ac and .school should either be moderated or abolished. By allowing all comers to register in those 2LDs the purpose of them having their own 2LD to begin with is negated.

3.

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

A: Yes.

2LDs (either moderated or unmoderated) which have very small numbers of registered domains and very low (or no) new registrations should be reviewed. A less is more policy should be adopted with regards to existing and new 2LDs.

3.1

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

A: If a 2LD has a small percentage of domain names registered (as compared to the entire .nz list) and new registrations are few and far between then it should be reviewed. Other concerns for moderated domains such as security (one argument for .bank.nz) or public awareness/recognition (eg .mil.nz) should be taken into account at this point. Hopefully the initial process to register a new 2LD is through enough that this step is never necessary.

3.2

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

A: Yes definitely.

It should be made clear exactly under what circumstances this can be done, and what would happen to existing domain holders in that 2LD.

4.

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

A: A less is more approach should be taken.

Is there a specific need for this new 2LD?

Is the community of interest large enough (for unmoderated) or cooperative enough (for moderated)? Could the needs of this group be equally served under another 2LD (is this just creation for the sake of creation)

5.

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

A: about right

comments: The process itself seems to work at this stage.

There is an argument for decreasing time limits at certain points - however it is my hope that the creation of a new 2LD will be rare enough that this will not matter!

6.

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

A: Enough to cover all costs for the DNC/other parties, and to ensure that the New Zealand Internet public is made aware and has a chance to provide their input.

7.

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

A: A New Zealand court if two parties (say the DNC and an applicant) were unable to resolve a dispute. Otherwise if a 2LD meets all the other requirements it should be allowed through (it is my hope that these requirements are specific and detailed enough to prevent an unwanted 2LD from creation anyway.)

8.

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

A: Moderated domains should be allowed to be created with smaller expected uptake if the purpose for being moderated is clear and warranted. Unmoderated domains should require large communities of interest and an expected high uptake to warrant creation.

9.

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

A: adequate

comments: The public input is a valuable and necessary part of the process. There is an argument for reducing the submission rounds to one, but again I hope the creation of a new 2LD will be a rare enough thing, that the extra public consultation is necessary.

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: Yes.

These are working well at this stage.

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: I believe this is unnecessary and would create too many additional complications. The .nz namespace has been effectively divided with 2LDs. I do not see any additional technical or other merits for doing so.

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 believe this situation would be complicated both legally and technically and is one of the main reasons direct registrations should not be opened. I am unable to think of a reasonable answer to this question which would satisfy all the potential parties in this difficult situation.

13.

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

A: I believe this situation would be complicated both legally and technically and is one of the main reasons direct registrations should not be opened. I am unable to think of a reasonable answer to this question which would satisfy all the potential parties in this difficult situation.

14.

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

A: No.

The fees currently set are realistic and acceptable.

15.

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

A: The only viable option I can see is to leave things the way they are. A review of existing 2LD's with regards to their usefulness and relevance today would be welcomed by myself, but any proposition to drastically change the .nz namespace is unnecessary.

16.

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

A: Consider the cost to existing New Zealand business if the structure is changed. Consider if there is a real necessity for the change, are there technical and logistical issues with the existing structure, or is this simply change for the sake of it.