

1 July 2008

Domain Name Commissioner  
PO Box 11-881  
Wellington

Dear Ms. Monahan

**Authorisation of Registrars (AOR) Policy Review**

Thank you for the opportunity to comment on your Authorisation of Registrars (AOR) Policy Review in .nz consultation.

The State Services Commission supports proposed changes 2 through 6 but would like further clarification on the intent of proposed change 1.

With regard to proposed change 1, there are likely to be circumstances where a new non-commercial closed registrar may be unable to meet this requirement.

We support the addition of a clause allowing the Domain Name Commissioner to require a period of operation, for up to 12 months, as a 'formal reseller' to an authorised registrar prior to authorisation being confirmed, providing the Domain Name Commissioner can waive this requirement at her discretion.

If you have any queries or require more detail, we are happy to further discuss any aspect of our response.

Yours sincerely

Edwin Bruce  
Manager, Investment and Collaboration  
Information and Communication Technologies Branch