

## **Jacob Doherty bank.nz submission**

**From:** Jacob Doherty

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I believe this 2LD does not meet the criteria for creation. Specifically, it does not pass the test for whether the community is significant both quantitatively and qualitatively.

Quantitatively there are a small number of institutions authorised by the Reserve Bank.

After the initial registration period, the number of domains registered is likely to be fairly static.

Qualitatively the argument could be made that a moderated 2LD will:

- Increase the general public's confidence that a given domain name does indeed belong to the bank concerned
- Is secure for them to enter their banking information.
- Help educate customers

I do not believe that this is correct, or that a moderated 2LD is the best way to achieve the above results.

Phishing attempts usually mask the URL contained on a webpage or in an HTML email.

For example displaying the bank's actual URL as text, but the hyperlink takes the user to an identical version of their website, hosted by the scammer.

Having a 2LD restricted only to banks will not prevent these scams, and indeed may have the opposite effect if the general public learns to "trust" any link containing .bank.nz

I believe banks could achieve similar results without the creation of a separate 2LD as mentioned in recent submissions regarding the RMC review.

For example:

"Insert a clause that states that a domain name must not consist of a word that is not permitted by law or the applicant itself is not permitted to use in accordance with any law operating in New Zealand. For example, Section 64 of the Reserve Bank of New Zealand 1989 Act which places limits on the use of restricted words such as "bank", banker and "banking" in a name or title. If an application seeks to use such restricted words then the relevant registrar will be required to carry out checks that the applicant is permitted to use these words in their domain name."

- Registrations that contain the word "bank" could be checked and granted as per the Reserve Bank Act.
- Banks could register domain names containing the word "bank" eg: brandnamebank.co.nz

Bearing in mind that this is the 3rd time this 2LD has been proposed:

In my opinion the application does not contain new information or changed circumstances that would make it a useful addition to the current DNS hierarchy.