

29 November 2007

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Dear Richard

#### **INTERNATIONALISED DOMAIN NAMES (IDN) IN .NZ – CONSULTATION**

Thank you for your letter of 15 October 2007 providing the New Zealand Bankers' Association with the opportunity to respond to the above consultation.

The Association is primarily concerned that any macronised vowels can be used for typographical based cyber-squatting and/or potentially even attacks against legitimate organisations, for example, phishing attacks and specifically homographic attacks. (See [http://en.wikipedia.org/wiki/IDN\\_homograph\\_attack](http://en.wikipedia.org/wiki/IDN_homograph_attack)).

As the Domain Name Commissioner does not currently prohibit domain name registrations that are identical or almost identical to existing domain name registrations (i.e. <http://www.asb.co.nz/>) then this could cause significant disruption for legitimate users and detract from consumer confidence in the Internet as a financial services channel.

In addition, organisations could be looking at significant expenditure to capture and maintain all possible domain names with macronised vowels in order to prevent such imminent threats as cyber-squatting and phishing attacks.

The Association trusts that you will find this response useful and would be happy to provide further information on any matters if it would be of use to your consultation.

Yours sincerely



Alan Yates  
**Chief Executive**