



27 March 2007

Domain Name Commissioner
PO Box 11-881
Wellington

Dear Ms. Monahan

Application for a new second level domain - .bank.nz

Thank you for the opportunity to comment on the application for .bank.nz as a new second level domain. This response is on behalf of the State Services Commission (SSC). I have consulted within the SSC and comment as follows:

1. In general, the SSC is supportive of moderated 2LDs that improve security and privacy and help build trust in the Internet, by extending the scope of existing and recognised roles and relationships in the physical world to the virtual environment.
2. We consider linking a statutory register to a moderated 2LD is appropriate, as long as the purpose of the register is supported by the moderation policy and related operations.
3. Specifically related to the application of the NZBA for the creation of .bank.nz:
 - We support the NZBA as an appropriate moderator for .bank.nz,
 - We consider the .bank.nz moderation policy should be developed and operated in such a way as to meet the purpose of the “public register of persons known as registered banks”. For example, a process to allow the immediate suspension of the use of registered names in the .bank.nz second-level domain in the event a bank is de-registered or suspended from trading. It will be important that this suspension has immediate effect as any delay will allow continued “virtual” trading contrary to any legal restrictions that may be in effect.
 - We expect necessary approvals have been received from the Reserve Bank of New Zealand.

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

Yours sincerely

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Chris Roberts
Senior Advisor
State Services Commission