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Question 1. If you consider registering a .nz domain name in the future, would you like anyname.nz to be an option rather than a name under just the second levels, e.g. anyname.co.nz?

No

The clear feedback in response to the May 2012 consultation paper was that 62% of respondents were against the proposal with only 32% for. Given this majority it is surprising to see a further consultation paper on this subject. It feels like the DNC is trying to force policy through when it is not supported. One can only assume that this is in response to the new TLD's coming on stream soon and the perceived threat associated with this.

Question 2. Would likely short term confusion over a transition period be an acceptable consequence for offering a long term option of allowing .nz registrations at the second level?

No

The fact that the DNC recognises that there will be confusion then it is again hard to understand why this subject is being so heavily pushed. There is likely to be mass confusion associated with the new ICANN accredited TLD's so I would have thought that stability within the NZ name space should be encouraged at this time. DNC policy needs to be based on maintaining stability and avoiding confusion and listening to clear feedback from the Internet community. Refer to response 1.

Question 3. Do you agree that existing .nz registrants should get a priority right in obtaining their name at the second level if this proposal proceeds?

Yes

An absolute no brainer that protection needs to be given to existing registrants should this proposal be forced through.

Question 4. Do you agree with the approach in the draft amended policies if we proceed with this? What, if anything, would you change?

Yes

I would consider having in effect two sun rise periods. One for registrations pre May 2012 (first priority) and one post May 2012 (second priority). The second group needs an element of protection against future potential cyber-squatters. On this point we saw a high level of squatting attempts on the back of the kiwi.nz launch so believe that this threat is genuine. The pre May 2012 approach leaves a gap in policy.

Question 5. Do you support the proposal that a current registrant of a .nz name at the third level should be able to reserve that name at the second level for no cost if they wish to block others from registering it but not actually utilise it themselves?

No

As a registrar with thousands of customers we believe that a zero cost solution is likely to result in an uncommitted approach to registration from existing registrants and to cause financial loss to registrars. We would still need to support our customers during this process with increase customer support levels and have no sensible means to recover costs as the product will be offered for free. Whilst we accept that we could arguably charge for the service market forces will likely make this unfavourable. Given this IF this becomes policy then we would rather have the new extensions become live straight away and maybe discount the wholesale fee by say 50%.

Question 6. Is two years an appropriate time to wait before reviewing policy to allow a reservation at no cost? Should this time frame be longer?

No

Far too long. 1 year max. This just extends the limbo time for the NZ space.

Question 7. Is two years an appropriate time to wait before reviewing the policy to extend the Dispute Resolution Service to sub-domains of second level registrations? Should this time frame be longer?

Yes

No further comment.

Question 8. Do you see any benefits from allowing registrations at the second level which have not been covered in this paper?

No

We do not see material benefits but see many risks and costs.

Question 9. Do you see any detrimental effects from allowing registrations at the second level which have not been covered in this paper?

Yes

Costs to the registrar! IF this becomes policy then we would support the extensions becoming live straight away during SR period. We support a discount period rather than a free period so that registrars are not adversely impacted by the likely confusion.