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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

I believe there should be more second level domains as categories for name registration; the existing categories are insufficient. But I do not believe abandoning categories and forcing people to rely on ad-hoc solutions to make names unique is the correct answer. (Once general registration is possible at the second level, the chances of later creating good categories is minimal -- all the good categories will be taken as generic names to aid search engines, "I feel lucky" domain name guessing, etc.)

*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

N/A.

*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

Yes, if this policy goes ahead it would be utter chaos without a reasonable period where existing names can be "ported" across to the new registration hierarchy (ie, directly in the second level), since the chances of, eg, domain squatting would be greatly increased if there were simply an open Gold Rush.

*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

In addition to my answer to the next question (ie, suggesting tying the reservation at 2ld to the 3ld registration being active), it also seems to me that the policy does not address what happens when a 3ld was registered at the key date (2012-05-30) but subsequently lapsed. I suggest strongly considering that only 3lds that were both registered at the key date (2012-05-30) and have been continually registered since then qualify for the extended (2 year) reservation period. (There might be policy reasons for suggesting that names that were registered at that key date, but lapsed since then, should be eligible for the sunrise period, since maybe they gave it up to pick up an alternative gTLD name and would like name.nz. But I don't believe they should get two years of blocking others just because they happened to be registered on one specific day.) Related to that the conflict policy does not appear to address what should happen if a name was registered on that key date, lapsed, and someone else then picked up the registration subsequently. To prevent "lapsed registration squatting" later registrants probably should not get full equal sunrise/reservation privileges. But if, eg, 2 years has gone by between the key date (2012-05-30) and the policy coming into effect (eg, mid-2014) then it seems a little punitive that a legitimate registrant in June 2012 should be completely without rights

even if they can present evidence the earlier registrant does not want the name. Possibly there should be a modified version of the "conflicting registrations" policy in that "name reuse" case.

*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?*

Yes

The policy as drafted appears not to address the situation where an existing (3ld) lapses, and what would happen to the 2ld reservation: the draft implies that having "reserved" the 2ld, that reservation will be active for two years, irrespective of what happens with the 3ld that qualified the registrant to claim that reservation. This seems unfair to other registrants in the case where someone abandons the name: no one else would be able to register it for another two years. I think it would be fairer to tie the 2ld reservation to the 3ld registration that qualified the registrant to claim it. Ie, when there is a 2ld reservation tied to a 3ld registration, at the point that the 3ld registration is released for other registrations the 2ld should also be released for other registrations. If the policy is like that (ie, you can maintain the 2ld reservation by continuing your existing 3ld registration), then the economic effect is more neutral: for two years you can "have your existing 3ld and reserve the 2ld for later transition" for the one registration cost. That allows two years to complete the transition (eg, when reprinting stationery, redeveloping the website, etc). But if you stop paying anything for the name, then you don't get to block others (which is probably most relevant to more generic names).

*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

I think it would be appropriate to review the uptake after 1 year. If (and only if) the reservation is tied to maintaining a continuous 3ld registration, I'd support anything in the 1-5 year range for the "includes free reservation of the equivalent 2ld" -- but probably still plan on reviewing it each year (say 6 months in advance of the run off date).

*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

It may make sense to review it after 1 year; but in practice the rollout periods suggested are sufficiently gradual that there'll probably be little experience of some parts of it to review after only 1 year.

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

No

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

Yes

The draft does not appear to address typo domains at all. For instance, the person who gets "com.nz" is probably going to be able to claim a considerable amount of typo traffic. The person who gets "www.nz" probably even more so. Some thought would turn up others (I recall mentioning more in my last submission). At minimum I believe names like that should be treated as automatically reserved for, eg, the Domain Commissioners office, for the initial period; possibly a separate proposal should be developed for them (but if they are automatically reserved then that policy could come later).