

From: Inland Revenue, Sharon Mullin
Received: Wednesday, 31 July 2013

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 proposed changes do not change our earlier submissions. We remain opposed to an extension to the .nz domain name to the second level.

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

We disagree that any confusion would be short term. We also cannot identify any material benefits from the proposal that would justify confusion – short term or otherwise.

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

If there is more than one existing .nz registrant, and one of those registrants owns a registered trade mark, then that registrant should have the first right to register the related domain name. Alternatively, give preference to government department or agencies who are registrants of govt.nz domain names where there is a matching registration in another domain.

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

No Response

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

It is unlikely that we would reserve a name as this only defers the adverse effects of the proposal. We consider that we would be forced to register a .nz domain name to protect:

- the public from the risks of phishing or other scams; and
- our trade marks.

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

The period should be indefinite. If it is not, we will be forced to register a .nz domain name (as discussed above) given the limited benefits from delaying registration.

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?

No

The time period should be longer.

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?

No

None that haven't been discussed in other submissions responding to this consultation paper and the consultation paper released in May 2012.