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Received: Sunday, 23 June 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

This is one-sided. What about: (a) "why?" (b) "is this because you perceive that competitors will do so?" (c) "would you still want this to be available even if it meant that you were less likely to get the name you wanted than under the current regime?"

*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

Those who do not wish to move will face a perpetual (and increasing) confusion about the validity of their domains, not just short-term confusion.

*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?*

No

If the price for allowing this to proceed is that it has to be gerrymandered in favour of existing registrants, then there is something unsound in the proposal to begin with.

*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

What about asking "what if we DON'T proceed". The lack of balance is quite disturbing. All the issues which it is claimed would be "fixed" by this proposal can easily be fixed in other ways, less detrimental to the existing registrants.

*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

No, see (3)

*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 Response

*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 policy should be reviewed immediately, before proceeding with this proposal.

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

More income for InternetNZ. We get to extort more money from existing registrants by making their existing registrations lose value, and "encouraging" them to take additional registrations. (Yes, by putting this under "benefit", I'm being sarcastic.)

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

Yes

Detrimental impacts:

To existing registrants where domains conflict: Opportunity cost of waiting-out the reservation period. Risk of not obtaining the shorter domain.

To future registrants where domains conflict: Opportunity cost of waiting-out the reservation period. Risk of not obtaining the shorter domain.

To existing registrants, where the 2nd-level domain is obtained: Double-up registration charges. Eventual migration costs before relinquishing the longer domain (which is inevitable). Migration costs for users of 4th level subdomains (which are invisible to InternetNZ). (I work with an example where 4th-level registrants are provisioned from a trust which holds the 3rd-level domain, and because of conflict with another 3rd-level domain, the trust isn't guaranteed to get the corresponding 3rd-level domain.)

To future registrants obtaining 3rd-level domains: Confusion over which 2nd level domains are managed, and by whom. Lack of policy oversight or enforcement.

To the public: Consequently, a distrust of any "funny looking" domains -- i.e. those having more than one dot -- 3rd-level domains. Lack of "whois" records on subdomains.

Generally: The fact that this policy change will inevitably trigger a "land rush" is to me quite sufficient reason to have grave concerns about its validity. We are entrusted, among other things, with ensuring fairness and equal accessibility. A land rush is by definition does the opposite: the immediate creation of winners and losers. I would feel happier about this if all "short" labels -- say 5 or fewer characters -- were indefinitely reserved for future use delegating 3rd-level domains under them. Or alternatively, that all 2nd new level domains be delegated with the proviso that 3rd-level domains within them may ALSO be delegated directly from the DNC nameservers. (Yes I'm well aware that this latter would "break stuff", to which I answer "that's the cost of doing business using a 2LD, take it or leave it".)