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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?

My answer to this has not changed since the last consultation.

The reasons outlined by the DNC for allowing registrations at the 2nd level is that it will permit buyers of domain names "greater choice".

Given the provision of only ~ 1,300 zones in the .gen.nz hierarchy, it seems unlikely that a buyer would not be able to find an available and appropriate domain name in this zone, if their use case was not supported by any of the existing zones.

I do not agree that the DNC should be involved in "aesthetic" decisions such as whether or not "example.nz" is preferable to "example.gen.nz", when both serve the same functional purpose. The DNC should be focussed on testable technical and commercial concerns.

There is a large cost associated with opening up 2nd level registrations to permit "categorisation free" .nz domain names, yet the demand for such "generic" domain names in the .gen.nz hierarchy has been shown to be very low, bordering on non-existent when compared to .co.nz (.gen.nz is still around 0.3% the size of .co.nz).

Some specific concerns:

Due to the lack of a central authority on what constitutes a valid "domain" vs "sub-domain" (for use e.g. in cookie security policies in browsers), numerous hard-coded lists exist in different pieces of software. These lists will be broken by changes to the .nz zone hierarchy and require manual rectification at each place where they are deployed. This is likely to never be done in legacy or small deployments, which will then remain forever broken for "new" .nz domains. This could potentially result in security problems either temporarily or permanently in locations where these lists are deployed.

Any changes which encourage the "renumbering" of URIs will be harmful to the web at large. For instance if an organisation feels pressured to register "example.nz" to go with their existing "example.co.nz", there is a likelihood that over time URIs previously of the form "http://example.co.nz/resource" will be retired or "left to rot" in favor of "http://example.nz/resource". This is a well documented problem for the web (see <http://www.w3.org/Provider/Style/URI.html> and

<http://www.w3.org/TR/cooluris/>) and by extension for New Zealand businesses and customers. If the old URIs are not eventually retired this leads to extra unnecessary cost for the business to maintain both the domain and the infrastructure serving it.

Flattening the hierarchy may have implications on future scalability of the .nz zone, (by e.g. making it impossible to delegate portions of the zone to different authoritative nameservers). The Domain Name System is at its core a hierarchical tree. I see no reason to damage this hierarchy by "flattening out" the .nz zone at this time. This may be a non-issue but I would like to see commentary from the NZRS on it.

The potential for enabling phishing and typo-squatting attacks is considerable if second level registrations were permitted. For instance the inobvious difference between "example.co.nz" and "exampleco.nz" when applied to e.g. banks, social networking or online auction sites would be a boon for criminals. An attacker would additionally have no trouble obtaining an SSL certificate in the name of "exampleco.nz", thus further

legitimising the phishing site's appearance in a time when users have been trained to "look for the lock" in their web browser.

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 security, social and commercial cost of making this change outweigh the benefits, given the slim benefits presented.

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

I do not support permitting registrations at the .nz 2nd level.

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

I do not support permitting registrations at the .nz 2nd level.

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

I do not support permitting registrations at the .nz 2nd level. This seems overcomplex and unnecessary at best.

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?

I do not support permitting registrations at the .nz 2nd level.

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?

I do not support permitting registrations at the .nz 2nd level.

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

No

I do not support permitting registrations at the .nz 2nd level.

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

Yes

See answer to Question 1.