

From: Nigel Hopkins
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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 .co.nz, .org.nz, .govt.nz, .net.nz, .gen.nz, .maori.nz, .kiwi.nz, .health.nz, .school.nz, etc., serve an important purpose and for the most part, are widely adhered to standards globally (see for example, Australia, UK, US, etc.). If they didn't serve an important purpose, why would they have been implemented in the first place? Presumably years of thought went into their implementation and we should be wary of new ideas being fast-tracked when there is really no burgeoning need to be seen. Arriving at a site using the .org.nz extension immediately gives the user some indication that the site represents a non-profit or community organization (rather than a for-profit entity). It is useful additional information and a heuristic that is likely heavily relied upon. .nz is an unnecessary addition to the New Zealand domain space and is not consistent with many international extensions (e.g., .org, .com, .net, .ac, etc.). It will make the NZ domain space more confusing with no defensible benefits. I'd like to see a lot more research work done on the "POTENTIAL BENEFITS" so that we can be clear on what the "ACTUAL" benefits are in relation to the "ACTUAL" costs.

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

It isn't clear what the long term benefit of offering .nz is. Thus a trade-off cannot be evaluated.

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

However, there is a gaping hole in the current proposal for Sunrise Period registration of the new .nz name. For example, let's say I have been waiting several years for a particular premium name to become available and it could not be acquired from the registrant during that time either because they were using it or wanted an exorbitant amount for it. Let's call it "awesomename.co.nz". Let's say the domain, just like thousands of other domains annually, becomes available (drops) after May 30 2012 and I register it and begin building my business around it. How fair is it that the pre-May 30, 2012 registrants of awesomename.net.nz or awesomename.org.nz should receive preferential access to awesomename.nz over my patient and successful registration of awesomename.co.nz. The registrants of awesomename.net.nz or awesomename.org.nz also had the opportunity to register awesomename.co.nz but elected not to. At the very least, if a name was "ever" registered prior to May 30 2012, its registrant of record during the Sunrise Period should be able to apply to register awesomename.nz. The 2013 registrant of awesomename.co.nz (first registered in 1999 but dropped and re-registered in 2013) should have exactly the same rights (if not more rights) than the 2009 registrant of the parked awesomename.geek.nz. Many people spend hundreds, perhaps

thousands of dollars to acquire a good .co.nz name they have been waiting for when it drops and this should account for something. The more time that transpires between May 30 2012 and any eventual implementation of this proposal, the worse the overall problem will be. As it is, there is already a year of new .co.nz registrations that have no preferential claim to the ultra-competitive alternative of theirnewname.nz under this proposal.

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

Please see my comment in relation to #3. The proposal leaves legitimate registrants of .co.nz domains following May 30, 2012 out in the cold.

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 *current registrant* of the .co.nz"

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

This is two questions.

a) Is two years an appropriate time to wait before reviewing policy to allow a reservation at no cost? No.

b) Should this time frame be longer? 5 years is a more useful window as it would allow case studies to evolve whereby current holders would have more insight into how important .nz is likely to be in relation to protecting their brand, etc. 2 years does not give enough time for a robust assessment.

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

This is two questions.

a) 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? No.

b) Should this time frame be longer? No. Dispute Resolution Services should be extended immediately.

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

No

The benefits put forward are shaky at best (from Pg 3.).

1) "More choice" is not a defensible benefit - particularly in relation to the current number of domains registered in the NZ domain space (small) and the number of NZ extensions available to choose from.

2) "Has general support" is not a benefit - it may be a fact, but it is not a benefit. I would add to this, that understanding this proposal and its implications is not simple and the "support" being reported is likely of a "lay" nature. DNC: "The proposal gives you more choice. Good or bad?" General Public: "Great". Ask the business owners polled if they are willing to pay two registration fees annually.

3) "Shorter domain names" (useful for mobile devices). Where is the mobile UX research to back this claim? Mobile is moving more and more toward an apps world and away from the browser.

4) "More suitable, unique and representative domain names" What does this mean and by what standard is this judgement being made. It sounds pretty, but it means nothing.

5) "Future-proofs .nz domain space" I don't see how doing this now "future-proofs" anything. Again, it sounds good, but it means nothing. Anything done now could be done at a later date with no detrimental effect other than the inherent detrimental effects this proposal will have.

6) "Registrants do not have to choose a category that may not be a good fit for them" Where's the research on this? The majority of websites in NZ are of a commercial nature. There are school websites. There are non-profit websites. There are government websites. I can't see where this lack of fit can possibly be coming from and it is almost certainly the exception rather than the rule.

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

Yes

This is a different model to the UK, to Australia, to the US (.com, org, .net, etc.). It will add confusion. It will also cause all those with current NZ domain names to have to register an additional name to protect their brand/interest/community, etc. ... at an additional cost. No one gains from this proposal except for the registrars, and the DNC.