

## **.NZ registrations at the second level:**

### **Policy Consultation Response from the following group accredited registrars:**

1. Digiweb New Zealand Limited
2. Discount Domains Limited
3. Register Domains
4. Bottle Domains
5. Utopia Domains

### **Responses:**

#### **1.0 Preferential Registration Eligibility:**

1.1 The criteria for being eligible amounts to reference to two key dates being 30/05/12 and 11/10/13. Resolving conflicts after this amounts to mediation and agreement. We believe that this will involve an approach from certain registrants that amounts to demanding large sums of money to agree to relinquish rights, which is not appropriate. We believe that where mediation does not reasonably resolve the conflict then a pre-determined process should be agreed upon to decide ultimate eligibility. We would propose the following to be assessed:

- 1.1.1 Auction – this way the party considering extracting a premium price would be forced to bid themselves rather than just demanding sums with no down side risk. We believe that any proceeds from this approach should be retained by the DNC and used to lower domain name wholesale rates into the future; or
- 1.1.2 First come first served – the first registrant date be given priority where a conflict cannot be resolved. This appears to be consistent with the DNC's wider policy of first come, first served.

#### **2.0 Domain Reservation Period/Approach:**

2.1 We believe that the best way to protect eligible Registrants is to automatically reserve a domain name for them rather than asking them to reserve the domain name at the second level via a DNCL website. The opting in approach will lead to far more disappointed users. This should be married to a reduced reservation period. See 2.2 below.

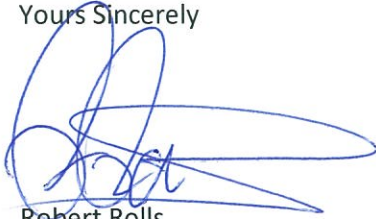
2.2 The reservation period should be reduced to 6-12 months. This ensures that the adoption of second level domains is quicker and more certain than a 2 year limbo that will likely be created by the current proposed timescales.

#### **3.0 Domain Name Reservation via DNCL website:**

3.1 We would like to see an API created such that the Registrant can reserve their second level domain name via their existing Registrar control panel. The idea that a registrant has to be passed direct to the DNCL website to reserve a domain name is concerning. This is especially so given that the Registrant has to

use their UDAI code as this might lead to additional unnecessary churn during this uncertain time. Digiweb would like to control their consumer experience end to end in this regard.

Yours Sincerely

A handwritten signature in blue ink, appearing to be 'Robert Rolls', with a large, sweeping flourish extending to the right.

Robert Rolls

**Director – Digiweb Group**