

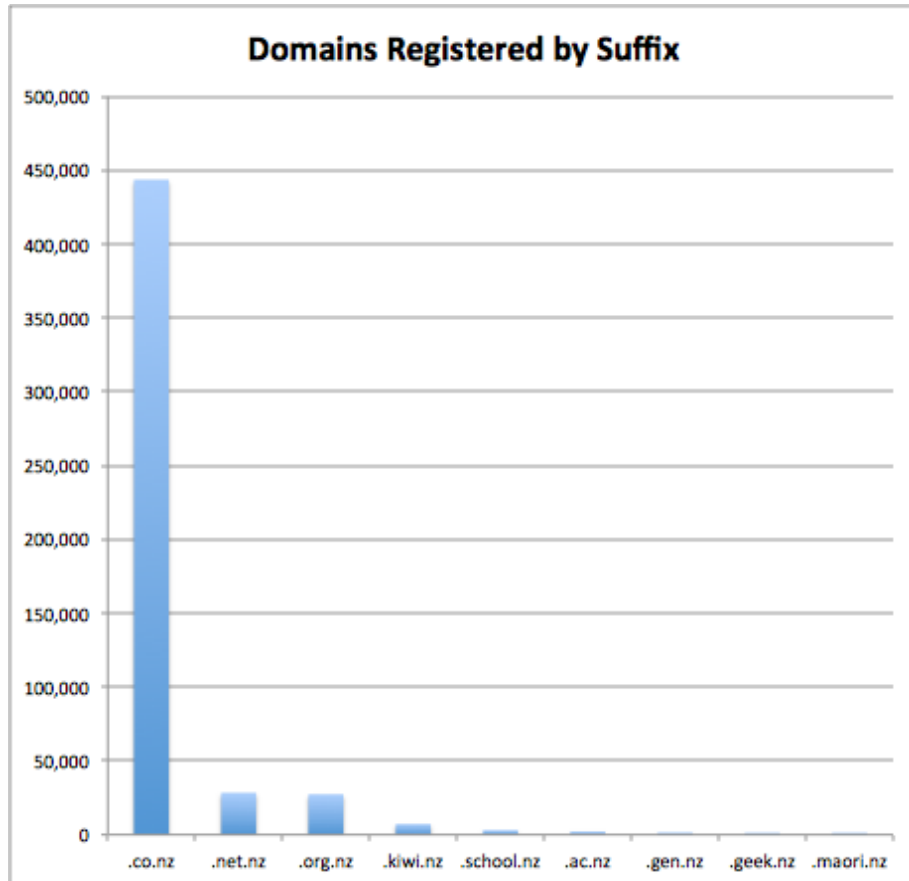
The behavior of InternetNZ and the DNC throughout this .nz proposal process is not consistent with that of a democratic nation such as NZ. Consistent lack of due diligence and arrogance on behalf of InternetNZ leadership is grounds for demanding resignations at senior levels. These organizations have the email address of every .co.nz domain owner yet they chose not to communicate the high level and most important changes in this proposal – clearly so that they could pass these changes quietly. They are supposed to be leading the NZ internet, yet their feedback process isn't even a simple online form that is scalable for large volume feedback. It is much easier for them to push new changes through if they 1) Don't widely communicate the proposed changes, 2) Don't communicate the major impacts, 3) Don't listen to the feedback anyway because they have already decided what they want to do.

If you agree with the statements in this feedback please contact the communications minister Amy Adams (a.adams@ministers.govt.nz) asking for intervention in the management of these important organizations that are critical to NZ's development.

- **The consultations to date were poorly worded, and did not state most important implications.**

Not only did they release their proposals quietly, but they have been unclear in their proposal that [.co.nz](#) domain owners could lose their .nz equivalent domain to someone who owns a valueless [.geek.nz](#), [.gen.nz](#) or [.net.nz](#). Everyone knows to secure a .co.nz first, and people only register a .net.nz if .co.nz is already taken. Only .co.nz owners should have first right (during 2 month sunrise period) to secure the equivalent .nz when it is released. Even a one-month sunrise period would suffice.

- **The proposal completely ignores the development over 20 years of a secondary and healthy marketplace for [.co.nz](#) domain names.** Over 85% of domains in NZ are .co.nz, the next largest is .net.nz with only 5.5%. 85% of domains are **.co.nz** for a reason, because **they are in demand**.



The proposal put in place will destroy the .co.nz marketplace overnight and cause possibly lawsuits in all directions. Domains are virtual real estate, and have currency. Under the proposal, someone who currently owns cars.geek.nz which is close to worthless, would have equal right to securing cars.nz over the owner of cars.co.nz, which would have a current value well in excess of \$50,000. If the owner of cars.geek.nz was granted cars.nz, they secure a \$50,000 windfall, while the owner of cars.co.nz domain value drops from \$50,000 down to under 1/10th of that value, because there is only room for one major nz suffix - .nz will replace .co.nz as the main suffix. InternetNZ thinks it has the power to create a whole new currency overnight, and destroy other previously strong currencies like [.co.nz](#). It shows that Jordan Knight and Debbie Monaghan have a lack of understanding of markets and general economics, which should be mandatory skillsets for people in these positions.

- **The proposal opens up the possibility of corruption accusations.** Those with prior knowledge of these changes – even those not closely connected to InternetNZ staff could have registered cheap, currently unregistered/no value domains such as travel.geek.nz, with the goal of having equal right to securing travel.nz over the owner of travel.co.nz, which would have a current value well in excess of \$50,000. There is no way to know which people could have known this in advance.

Other issues with InternetNZ & DNC

- **The DNC should not have its own domain court system**, and should not take even more control over the massive number of domain disputes that will result due to this poorly thought out proposal. There is a court system that exists for every other legal dispute, and there is no reason why domain name disputes should be treated outside of this system. InternetNZ and the DNC think they have their own legal system. This has resulted in an overreach of power at the DNC & InternetNZ because domain owners don't want to make enemies with the DNC through fear that there will be repercussions. The current DNC system is like if the nz police was merged with the nz court system. There is nothing wrong with DNC managing a mediation process, but it should not be making legal decisions outside of the court system. The DNC almost always sides with the large corporations. The .nz proposal also allows the DNC to make their own decisions on who would get the .nz version of an existing 3rd level domain outside of the court system.
- **Continual attempts to bring in more revenue while embarrassing the NZ domain space.**
Introductions of strange suffixes like [.geek.nz](#) and [.kiwi.nz](#) are further examples of incompetence by these organizations. The Australian domain space doesn't have [.aussie.com.au](#). NZ doesn't need that many suffixes, and its attempts to introduce more have proven to be a failure. The original suffixes [.co.nz](#), [.maori.nz](#), [.net.nz](#), [.ac.nz](#), [.school.nz](#) and [.org.nz](#) were enough for a country the size of nz. NZ as a country has a smaller population than each of the 30 largest cities in the world.
- **NZ domain space has some of the highest wholesale renewal prices in the developed world – InternetNZ sets these prices. It is supposed to be a non-profit yet it acts like a public company.**
Further scrutiny of how these organizations are spending their vast revenues should take place immediately. This new suffix is not only a money grab, but they are pulling the rug from underneath the existing domain suffixes and marketplace.

If you agree with any of the statements in this feedback please contact the communications minister Amy Adams (a.adams@ministers.govt.nz) asking for intervention in the management of these important organizations that are critical to NZ's development. Enough is enough, it is time for a leadership change.