

From: Glen Eustace, GodZone Internet Services  
Received: 4 June 2012

*Question 1. Should the New Zealand domain name space be extended to allow registration at the second level, for example yourname.nz?*

No, I don't think it should. My concern is the confusion that it would create in the market. It would be possible for me or any company to register 'kindergarten.nz' and then sell sub-domains to the public. We could then have '(www.)my.school.nz' and '(www.)my.kindergarten.nz' being presented as being equal but in fact they are not, the former requiring the use of an authorised registrar, the latter not. The two different domains being operated under potentially very different rules. But Joe Public would not be able to tell the difference.

*Question 2. Are there any other undertakings that the Domain Name Commission should make while developing/implementing the policy?*

As I don't support this change, No.

*Question 3. Should new second level domains be created to cater for particular interest groups, such as .wine.nz or .sport.nz?*

It is my opinion that having a more extensive set of 2nd level domains would make more sense than opening up the 2nd level to all comers. A much more relaxed policy to allow the creation of new names at the 2nd level would provide choice but also impose consistent policies, rules and management through the authorised registrars.

*Question 4. Should new moderated second level domains be created to cater for domain names that require special protection, such as .bank.nz?*

New 2nd level domains would still need to conform to a policy and one aspect of the policy should be the proposers desire to have the domain moderated. An example might be needing to be a lawyer if you want a subdomain of the law society's 2nd level.

*Question 5. Should the registration of some names such as .com.nz or .gov.nz, be prohibited at the second level to minimise potential confusion? What names, if any, should be prohibited?*

I would like to see the immediate implementation of DNAMES for many of these e.g. .com.nz -> .co.nz, .edu.nz -> .ac.nz, .gov.nz -> .govt.nz which immediately removes these from being registered but also makes them useful.

*Question 6. Do you agree with the rationale for the Sunrise Period that would enable existing .nz domain name holders first chance to register names at the second level? Why?*

I agree with the rationale but as I don't support the proposal to open the 2nd level, it is of no consequence.

*Question 7. Who should be allowed to register a domain name at the second level when there are competing registrations at the third level?*

I don't support the proposal to open the 2nd level.

*Question 8. Assuming only persons with a conflicting third level domain name may apply, how should that conflict be resolved? By consent? Or some other mechanism?*

I don't support the proposal to open the 2nd level.

*Question 9. Should the Domain Name Commission consider extending its Dispute Resolution Service for a limited period to cover particular sub-domains when considering whether a name registered at the second level infringes a complainant's rights?*

I don't support the proposal to open the 2nd level.

*Question 10. Is the approach as outlined in the proposed amended policy in Appendix C appropriate? Why?*

I don't support the proposal to open the 2nd level.

*Question 11. Are there any other comments you would like to make relating to this consultation?*

If .nz had not been implemented with a 2nd level structure, then allowing all comers in the 2nd level would already be the case. There is likely to be significant choice for registrant's when the new gTLDs start turning up.

If choice is important, then more 'managed' 2nd levels could address that.