

14 DEC 2007



12 December 2007

Domain Name Commissioner
PO Box 11-881
Wellington

Dear Ms. Monahan

Internationalised Domain Names (IDN) in .nz

Thank you for the opportunity to comment on your Internationalised Domain Names (IDN) in .nz consultation.

The State Services Commission endorses the addition of macronised vowels to the .nz domain space in principle. Enabling the full use of te reo Māori in domain names is in line with the aims and principles of the National Māori Language Strategy and the status of te reo Māori as an official language of New Zealand.

As moderator and registrar for the .govt.nz space, we are satisfied that the technical changes required by us as .govt.nz registrar and by those government agencies wishing to adopt IDNs are acceptable, providing there is a reasonable timeframe for change.

We believe that some level of moderation of internationalised domain names across all .govt.nz domains is likely to be required as IDN will create vulnerabilities to squatting and phishing attacks. IDN will also create the potential for homograph phishing attacks.

Without moderation, a registrant could potentially register an IDN version of an existing name such as kiwibānk.co.nz for malicious use. A more sophisticated scenario is also possible, for example: kōreromāori.co.nz with many variants possible: kōrerōmāori.co.nz, kōreromaori.co.nz, etc.

To minimise squatting and phishing risks, the following three issues should be considered:

1. Should there be rules governing priority right (or full rights) for existing domain name holders to new IDNs?

For example, should the owner of maori.org.nz have a priority right (or full rights) to māori.org.nz? In other words, in the New Zealand domain context should an IDN be considered a synonym for a non-IDN domain?

However, for some words the macronised and un-macronised versions are two distinct words with different meanings: "... anā means 'here is' or 'behold': Anā te tangata! (Here is the man!) But ana, with no macron, means a cave."¹.

*2. Should mixes of linguistically incorrect characters be permitted?
(e.g. kiwibānk.co.nz and kōreromaori.co.nz)*

If macrons are to be used should they only be permitted in a context of 'correct' usage of te reo Māori? That is, IDNs like kōreromaori.co.nz as a partial macronised implementation would not be permitted. The only valid options would be kōreromāori.co.nz and koreromaori.co.nz.

Requiring correct usage of te reo Māori IDNs would require expert moderation by fluent speakers of te reo Māori. Most registrars are unlikely to be able to support this so moderation of te reo Māori IDNs should be overseen by the Domain Name Commissioner.

3. Should double-vowels also be subject to policy/moderation in relation to the two issues above. (e.g. kōreromaaori.co.nz, kooreromaaori.co.nz, kiwibaank.co.nz)

Some writers of te reo Māori double the vowel instead of using macrons when indicating a long vowel. This issue should be considered in conjunction with the points above.

In summary, we endorse the addition of macronised vowels to the .nz domain space in principle, and recommend that the working group continue to look into the practicalities of implementing internationalised domain names, in particular:

1. Develop draft moderation policies and procedures to ensure that internationalised .nz domain names are not used for malicious purposes (squatting or phishing) and that the integrity of te reo Māori is maintained.
2. Define and communicate the requirements and timeline for technical support of internationalised domain names by registrars and registrants.
3. Undertake further investigation into extending support for internationalised domain names in .nz to other language characters.

If you have any queries or require more detail, we are happy to further discuss any aspect of our response.

Yours sincerely



Laura Sommer
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¹ Source: <http://www.nzhistory.net.nz/culture/tereo-100words>