



19 October 2015

Debbie Monahan
Domain Name Commissioner
Level 11
80 Boulcott Street
PO BOX 11-881
Wellington 6142

Dear Ms Monahan

Re: Review of the .nz WHOIS Service

I am in receipt of your letter dated 6 October 2015 regarding the review of the .nz WHOIS service being undertaken by the Domain Name Commission Limited (DNCL).

Thank you for drawing to my attention to the review and consultation process. I have attached feedback to this letter as Appendix A.

I wish you all the best for the review.

Yours sincerely

A handwritten signature in blue ink that reads 'Tina Wakefield'. The signature is written in a cursive style.

Tina Wakefield
Chief Information Officer

Appendix A

Why .nz registrant data should/should not be collected

Registrant data should be collected because it helps to identify the owner of an address, which is useful when tracing the source of possible spam or security threats. The data can be role based rather than personal thus limiting the distribution of personal information.

Privacy statements should always be provided on collection of information to inform what will happen with the information.

Why .nz registrant data should/should not be publicly available

Personal information could be anonymised (confined to role based only) or individuals are given an opportunity to opt out of publication, at the point of collection. The registration form could be amended to accommodate this. If opt out is not an option, this should be clearly stated. (Eg required by law/regulation)

Why the display and availability of .nz registrant data should/should not be the same for all parties

It should be the same for all parties but individuals should have the ability to prevent some details from being published unless there are very good reasons not to.

Why the current approach does/does not raise concerns for some

The information can be abused so it should be reasonably protected, commensurate with being available.

It would appear information is being published without individuals being given notice of what will be published. The Privacy act contains certain obligations in terms of advising individuals as to what will happen with their information.