# How to use this submission template

### Instructions

This template contains a full summary of the questions in the Options Report. You may wish to respond to one, many, or all of them.

For ease of navigation we have included the headings and options from the full Report. A plain text summary of questions without the table formatting is attached on page 26.

You are welcome to use the template, or make a submission through other means.

We are interested in any views you have. If you are able to support your views with evidence, we are keen to see this too. This might include facts, figures, research, or examples.

For the purposes of your submission on this paper, you should include your name (or your organisation’s name) and your contact details.

You can make your submission by:

* Email to [dotnzreview@internetnz.net.nz](mailto:dotnzreview@internetnz.net.nz)
* Post to PO Box 11-881, Manners Street, Wellington 6142, New Zealand

Submissions are due by **Friday 14 August**.

### Participate online

We will be releasing bite-size content on InternetNZ’s social media channels and the InternetNZ website. And you will also be able to provide your feedback there.

The Panel will also be hosting webinars where you can come and discuss your thoughts on the Report. To find out more and register your interest, visit <https://internetnz.nz/nz-have-your-say>.

### Use of information

The information provided in submissions will be used to inform the Advisory Panel’s recommendations to InternetNZ on changes to the .nz policies. The Panel or InternetNZ may contact you directly to clarify anything in your submission.

The Privacy Act 1993 establishes certain principles with respect to our collection, use and disclosure of information about individuals. Any personal information you supply to the Panel and InternetNZ in the course of making a submission will only be used by the Panel or InternetNZ in their consideration of what changes should be made to the .nz policies.

InternetNZ has an open policy making process and typically publishes all submissions to encourage open conversation. Individual names and contact details will not be published. If you would like to include confidential information in your submission, please contact [dotnzreview@internetnz.net.nz](mailto:dotnzreview@internetnz.net.nz) to discuss what arrangements InternetNZ might implement if we were to agree to receive the confidential information.

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### Your details

|  |  |
| --- | --- |
| Name | Michael Homer |
| Email address |  |
| Contact phone number |  |

I understand and agree that my submission will be made public on the InternetNZ website

I understand that my contact details will be redacted from the public version of this submission

I would like to speak to my submission with the Panel

## Guiding Principles

### Summary of proposed changes to the guiding principles for .nz

The Panel intends to recommend that the guiding principles for .nz be:

* .**nz should be secure, trusted and safe:** .nz infrastructure should be dependable and secure and .nz be a domain space people trust and feel safe using.
* **.nz should be open and accessible:** The .nz domain should be an inclusive space where everybody can observe, participate, innovate and enjoy online benefits.
* **.nz should be safe-guarded and operated for the benefit of New Zealanders:** The .nz domain space should be safe-guarded and operated for the benefit of New Zealanders, reflecting and being responsive to our diverse social, cultural and ethnic environment.
* **.nz should support te reo Māori and participation in .nz by Māori**: The .nz domain space should contribute to the protection and use of te reo Māori and facilitate participation in the .nz domain space by Māori.
* **.nz should enable New Zealand to grow and develop:** The .nz domain space should help people, businesses and organisations connect, create, innovate and grow.

### Lack of availability of characters other than English and te reo Māori alphabets in .nz domain names

* Option A: the current situation
* Option B: support additional characters as demand arises
* Option C: support all characters for most widely used New Zealand languages

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| 21. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
|  | Options B and C appear to have a potential/likely overlap (option C, followed by option B thereafter), but the options as stated do not suggest this. A list of the five languages in question would be useful, and from the last census appears to include English, Māori, Samoan, Chinese, and Hindi (Devanagari). Presumably, these would continue to be permitted if this ordering changed.  Accented Latin characters are therefore largely not included, which perhaps minimises the security issues of visually-ambiguous names (though French does appear shortly afterwards). However, there are a range of diacritics used with Latin characters within English text, in loanwords (café, föhn, jalapeño), and in proper nouns, that represent a relatively-small number of characters but enhanced accessibility for some uses, while also covering a range of Latin-script languages in one go. I would support permitting these characters as a group in the early phase as well, should security concerns be able to be addressed. I expect that any demand-based process would result in most of these being included eventually anyway.  The option to allow further characters beyond five languages is omitted, as is including non-language characters such as the grinning face in the Punycode example. While symbol-based domain names are of questionable usability, it is not unequivocally clear that they are undesirable (even √2.net is arguably useful) and these should be considered, even if ultimately dismissed. |
| 22. | Which option do you prefer? Why? |
|  | I would prefer the maximal widening of codepoints even beyond these options, and only Option B as proposed permits such expansion. However, a somewhat-extended Option C-then-B would be ideal. |

### No geographical limits on registrants

* Option A: The current situation
* Option B: Educate .nz users that .nz domain names can be held from anywhere around the world
* Option C: Impose a local presence requirement

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| 23. | Which option do you prefer? Why? |
|  | I am somewhat supportive of a modified version of option C. At present, there are large numbers of overseas-based “squatters” occupying much of the .nz domain space, and this change would eliminate that; however, incorporating a New Zealand company to act as legal owner is trivial and the commercial operations likely would, so the true impact may be limited.  The second “requiring” of the two “either” options is at once too strict (to individuals) and too relaxed (to other entities). Individual New Zealand residents who are neither citizens nor permanent residents ought to be able to register domain names. The first branch, requiring “a legal presence in New Zealand” appears to permit this. Requiring that overseas entities only “trade in New Zealand” is too weak in the absence of further definition.  I would instead suggest a pair of limitations:   * Individuals to be resident in New Zealand, or New Zealand citizens or permanent residents * All registrants other than individuals to be entities established, registered, or incorporated under New Zealand law   Option B is not a genuine option, since there is no practical approach to this education in any meaningful way, and it represents only a resource sink. Option A is adequate as the status quo. |

## Security and trust

### Domain and website content abuse

* Option A: The current situation
* Option B: ‘No concern for use’
* Option C: Suspension of a domain name on advice by a trusted notifier
* Option D: Implement an ‘acceptable use’ policy

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| 26. | Which of these options do you prefer? Why? |
|  | I prefer every option to Option C, which appears to delegate enormous authority to miscellaneous organisations without a clear process for determining these or having any insight into their internal processes. Of the remainder, option D may be the most suitable given the policy goals, but Option A is adequate under resource constraints. |

### Ensuring security best practice across the .nz domain name system

* Option A: The current situation: Registry has no levers to monitor or improve registrar security
* Option B: Require all registrars to adhere to minimum security standards
* Option C: Incentivise or mandate security features or practices

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| 36. | Which option do you prefer? Why? |
|  | Option B is the only one with realistic likelihood of improving the situation, with phased introduction to make it practical. |

## Conflicted domain names

### Self-conflicted names continue to be unresolved

* Option A: The current situation - the Registry continues to allow self
* Option B: Provide a deadline for the registrant to resolve the conflict themselves to avoid release of domain names.

### Other conflicted names continue to be unresolved

* Option A: The current situation
* Option B: Provide a deadline for all registrants to come to an agreement
* Option C: InternetNZ develops a criteria for prioritising registrants’ right to a .nz name

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| 39. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
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| 40. | Which of these options do you prefer? Why? |
|  | Self-conflicted names: Option B. These artificial conflicts have no benefit. Remaining unregistered 2LDs should go to open registration.  Other conflicted names: Option B, with the terminal case being an auction among conflictees, or general release if no participant in the conflict actually wishes to register the name. This creates a resolution and removes the concept of conflicted names. Creating a prohibited names list is no improvement over the current situation. Failing that, Option A, the status quo, presents no major problem and conflicts will likely lapse over time. Option C seems to have unworkable issues in formulating the priority list. |

## Enhancing privacy across the .nz domain name system

### Registrant data is made public by default

* Option A: Current situation
* Option B: The IRPO is opt out, i.e, individual registrants have the option activated by default
* Option C: All registrant contact details are withheld from query services for all individuals not in trade (no option to opt out or in)

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| 43. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
|  | As individual registrants are frequently their own administrative contact, the IRPO has little actual impact on these registrations, and this is not addressed by the options. This may be one reason that the access process is little-used in those cases where it might be. While technical contact information *may* conceivably be required urgently, the others cannot, and should be treated equivalently. |
| 44. | Which option do you prefer? Why? |
|  | Option C, as there seems little reason to have a separate opt-in process on top of simply declaring the domain to be registered in trade. |
| 45. | Under the IRPO, which contact details do you think should be withheld from WHOIS? |
|  | All of them, but especially address and phone number. |

### Implementation of the IRPO and access to registrant information when required

* Option A: The current situation
* Option B: Streamline the process described in clause 22 of the *Operations and Procedures* policy and make it more user friendly for requests to access ‘Withheld Data’
* Option C: The creation of a form that allows people to communicate with a registrant without requiring the registrant’s email address

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| 46. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
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| 47. | Which option do you prefer? Why? |
|  | Option C, if any change is necessitated by updates elsewhere, and otherwise option A. |

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