

# Draft .nz Rules

## Questions

1. Do you favour consolidating and rewriting the .nz policies generally speaking?  
Why / why not?

Yes- periodical policy review is an important process in order to ensure that as a Registry your Policies reflect your current standards, objections and values.

2. Could the draft .nz Rules be improved? How?

The reduction of documentation to streamline and simplify policies and processes and governing rules is always welcomed as it results in improved user experience.

3. Do you think the difference between policies and operational rules is clear enough? If not, how could this be improved?

It is clear.

4. Do the draft .nz Rules leave out anything currently in the existing .nz policy documents that should be retained?

No

## Proposed Implementation of Other Panel Recommendations

5. Do you consider the above principles should be adopted as the new principles for the .nz Rules? Why / why not?

The new principles for .nz are inclusive and encompass a modern and responsive approach to the management of the TLD. The acknowledgement and open encouragement of Maori communities to embrace and participate in the success of the TLD is welcomed and supported and noted by MarkMonitor. This progressive, modern approach to domain management is applauded and appreciated.

6. Do you agree that 'safe' should be removed from the first principle? Why / why not?

The retention of the safe is in line with the ethos and character of the existing words in the principle.

7. Do you think any of the principles should be modified in any other way?

No.

## Panel recommendations on existing principles

8. Do you think we should implement the Panel's recommendations on the existing principles as proposed above? Why / why not?

No objections to the implementation

9. Have we correctly assessed the implications of our proposed approach to the existing principles? Are there other implications we have not considered?

It is noted that the No Concern for Use has addressed the need for legitimacy which is an important prerequisite that ensures that DNS abuse is not circumvented.

10. Is there a better way of doing this?

No suggestions.

### Panel recommendations on the policy development process

11. Do you think InternetNZ should have greater flexibility to adjust .nz procedures & requirements by notice in writing?

In theory InternetNZ should be able to adjust procedures and requirements by notice in writing, however the notice should be a sufficient duration to reflect the time and business impact of the requested changes and amendments.

12. Is [20] working days enough notice before a change to the procedures & requirements is made?

20 working days is insufficient notice for any material changes to the procedures and requirements that may impact our day to day working practices. However, if the proposed change is cosmetic or has minimal impact on pricing or business operation (e.g. a new general guiding principle) a 20 working day notice is sufficient.

13. Are there any .nz procedures & requirements you think should be a .nz policy or .nz rule? Are there any .nz policies or .nz rules you think should be a .nz procedure?

No, not at this time.

### Panel recommendations on the exceptional circumstances provision

14. Do you think we should implement the Panel's recommendations on the exceptional circumstances provision as proposed above? Why / why not?

We support the implementation of the exceptional circumstance provision especially in light of recent events relating to both the pandemic and terrorist acts. However, we would also like to see the improvement and of the restoration processes relating to the suspension powers, as in our experience restoration of domains incorrectly identified was protracted and slow.

15. Have we correctly assessed the implications of our proposed changes to the exceptional circumstances provision? Are there other implications we have not considered?

We have nothing to add to this.

16. Is there a better way of doing this?

Please see above comments about the improvement and expedition of the restoration process.

17. Should the Commissioner be able to take any of the listed steps (change the Registrar, suspend, assign, cancel and lock) in the circumstances described in paragraphs a, b and c or or just some? If not, which steps should apply to

circumstances?

Please see response to question 14.

### Panel recommendations on privacy

18. Do you think we should implement the Panel's recommendations on privacy as proposed above? Why / why not?

We have no comment here.

19. Have we correctly assessed the implications of our proposed changes to the privacy option? Are there other implications we have not considered?

We have no opinions on the implementation of the privacy policy or IRPO, however it is imperative that the distinction between natural persons and legal entities are kept distinct and separated and the IRPO does not exceed scope in the incorporation of non-natural persons (e.g. businesses and companies)

20. Is there a better way of doing this?

No further comment.

### Panel recommendations on pricing variability and incentives

21. Do you think we should implement the Panel's recommendations as proposed above? Why / why not?

We have no objections to the diversification of your pricing models and pricing schemes.

22. Have we correctly assessed the implications of clarifying that we can offer enhanced features, add-ons and incentives? Are there other implications we have not considered?

No comment on the above.

23. Is there a better way of doing this?

No comment on the above.

24. How could we implement this in a way that will maximise the benefits for all registrars?

The introduction of diversification of pricing models in and of itself is the first step as this shall open up avenues to work alongside different registrars who have a different business model and client type.

## Registry Replacement Project Issues

25. Have we correctly assessed the implications of moving to yearly registrations and renewals? Are there other implications we have not considered?

We have no comment on this. However, taking a consultative and transparent approach is always welcomed as it provides the adequate platform to engage the registrar community at large and allow for them to vocalise their concerns or support.

26. Is there a better way of doing this?

[See previous comment.](#)

### Standardising the terminology

27. Have we correctly assessed the implications of aligning our terminology to reflect standard usage? Are there other implications we have not considered?

We agree with your assessment and we thoroughly support this course of action. Whilst we appreciate the respective identities of ccTLDs we also welcome the standardisation to ensure that we can implement and roll out products in a more uniform way.

28. Is there a better way of doing this?

[See previous comments on transparency and consultation on question 25.](#)