### Reimagining the future of .NZ - Classification Office submission

### Your details

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

[x]  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.

The Panel intends to recommend that the .nz policies contain the following operational guidelines:

* **First come, first served:** A domain name will be registered on a ‘first come, first served’ basis if it is unregistered and available for registration.
* **Restrictions on use should be minimised**: The ccTLD manager should keep restrictions on the way domain names can be used to the minimum necessary to enable the .nz domain to be trusted and safe.
* **Structural separation:** Regulatory, registry, and registrar functions are structurally separated.
* **Clear chain of relationships:** Registrants have agreements with their registrar, and all registrars with the registry and with DNCL. Where appropriate the DNCL can intervene in these relationships consistent with this policy, the .nz policies and associated agreements and contracts.

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| 1. | Do you consider that the .nz guiding principles should be visionary, holistic, inclusive and instructive rather than operational? Why / why not? What else should they be? |
| This is a fairly significant change for the overarching principles to guide management of .nz and one that the Classification Office is very supportive of. We consider that the .nz guiding principles should be visionary, holistic and inclusive instead of operational. We support the guiding principles being expanded and see that making these changes reflect the way the digital space and use of .nz has changed overtime.Internet NZ and the Domain Name Commission have a clear responsibility and role to play in mitigating harms in this area – the new principles far more accurately show that and would send a clear message to those who may be wanting to misuse .nz.A general comment in relation to the drafting of the new principles – they currently read ‘.nz should…’ – perhaps as guiding principles it is better to be framed as ‘.nz is…’ or ‘.nz aspires to be…’ to capture the aspirational nature of them. |

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| 2. | Do you think the .nz policies should be rewritten and simplified? Why / why not? If yes, how? |
| Yes – we support the changes to policies to simplify them and ensure they are clear and easy to understand for all.The rationale provided makes sense and we are very supportive of any action taken that seeks to make information more accessible to enable people to make informed decisions.The options provided for simplifying the policy framework seem to be pragmatic and focused on getting the best outcome. We are supportive of this approach. |

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| 3. | Do you think there should be a new ‘secure, trusted and safe’ principle? Why / why not? Do you have any comments on the proposed formulation of the new principle?  |
| The addition of this principle is absolutely supported by the Classification Office. Adding a clear principled focus on security and safety is important and timely. The current guidelines are silent in this area, which is notable. A move to add a new principle in this area is positive and may require some assessment of whether or not the existing practice needs to be adjusted to realise this principle. We agree that it is time for InternetNZ to move away from a ‘no concern for use’ mindset. The environment has shifted so much that we need to be consciously aware of everyone’s responsibilities in this space.This could be strengthened by splitting the principle into two separate principles (given this principle is focused on two areas), this could be as follows:**Secure and Reliable****.nz infrastructure is dependable, resilient and secure:** any users of .nz are assured that the infrastructure is secure, current and reliable, has good resiliency and provides security for its users**Trusted and Safe****.nz is a place that is safe and trusted:** .nz is a domain that people trust and feel safe to use. .nz users know that their privacy is protected and are given other options The Classification Office is also supportive of the suggestion that InternetNZ provide options and support for when something makes people feel unsafe. There will be opportunities to connect to agencies, such as ourselves to assist with this and to direct people to. |
| 4. | What would be the main benefits and disadvantages of moving from a ‘no concern for use’ approach to a ‘secure, trusted and safe’ approach?  |
| The key benefits in shifting approach in this context are:* Sending a clear message to all stakeholders that the ‘care factor’ is increasing is positive
* Allows InternetNZ to better reflect the shift that they have already started to make in practice
* Sets an expectation for internal staff – which in turn should drive practice
* Adds value to overall eco-system in NZ
* Positive reputation – with particular groups in society (national and international)

Possible disadvantages:* Managing expectations – e.g. you can’t make everything safe always, so what does this mean in practice?
* Possible resource implications (if this is something that goes ahead and behaviour/process needs to change to implement)
* Negative reputation – with particular groups in society (National and International)
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| 5. | Do you think there should be a new ‘open and accessible’ principle? Why / why not? Do you have any comments on the proposed formulation of the new principle? |
| Yes agree and are supportive of the current draft formulation of the principle and the rationale to support it. |

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| 6. | Do you think there should be a new ‘New Zealand benefit’ principle? Why / why not? Do you have any comments on the proposed formulation of the new principle? |
| Yes agree and are supportive of the current draft formulation of the principle and the rationale to support it. |

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| 7. | Do you think there should be a new principle on te reo Māori and Māori participation in .nz? Why / why not? Do you have any comments on the proposed formulation of the new principle? |
| Yes agree and are supportive of the current draft formulation of the principle and the rationale to support it. This proposal would be strengthened through engagement with Iwi. |

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| 8. | Do you think there should be a new guiding principle on enabling New Zealand to grow and develop? Why / why not? Do you have any comments on the proposed formulation of the new principle? |
| Yes agree and are supportive of the current draft formulation of the principle and the rationale to support it. The digital engagement and the procuring of .nz domains enables NZ business to take their services global, .nz should be seen as a part of their trusted brand. |

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| 9. | Do you think there should be two types of principles (guiding principles and operational guidelines) to help manage the .nz domain? Why / why not? |
| Yes – it is important to have some operational guidelines that can provide staff with clear guidance on how to realise the overarching guiding principles. The current guiding principles that have been identified are important and would need to be retained operationally.The operational principles could be used internally – as part of operational policy for staff and the guiding principles be what is shared publicly. It will be important that any operating principles clearly connect to overarching guiding principles and that there is clear escalation and understanding of the guiding principles to resolve any issues. |

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| 10. | Do you agree that the ‘rule of law’ principle should not be retained as an operational guideline? Why / why not? |
| This is a clear requirement as part of operating within NZ law – this does not need to be an explicit guideline. For international people interested in securing .nz it may be beneficial to include an explicit note somewhere in the process to secure the .nz domain that is clear about adhering to NZ law.  |

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| 11. | Do you think the ‘first come first served’ principle should be modified and retained as an operational guideline? Why / why not? |
| We understand and are supportive of the intent of the ‘first come first served’ principle however would see occasions outside of those involving te reo (as the paper suggests), where you may seek to not allow a particular domain name – this can be covered in your policies. |

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| 12. | Do you think the ‘first come first served’ principle should be modified and retained as an operational guideline? Why / why not? |
| Suggest making a slight change to what is proposed so that the new principle reads:**First come, first served**: A domain name will be registered on a ‘first come, first served’ basis if it is unregistered, available for registration and is in line with Internet NZ policies.This would mean that there needs to be a clear policy on domain names – outside of Te Reo considerations, there will be other words or phrases that should be unacceptable and the policy should be clear on what makes something unacceptable (e.g. a domain name that is clearly advertising what could be illegal material etc). |

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| 13. | Do you agree that the ‘low barriers to entry’ principle should be removed? Why / why not? |
| Understand and support the rationale for this, particularly as it pertains to the impact on a ‘more secure, safe and trusted.nz’ |

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| 14. | Do you agree that the ‘no concern for use’ principle should be modified and retained as an operational guideline? Why / why not? |
| Yes – keep as an operational guideline (though modified) – however take out of the overarching guiding principles. This principle would not sit well with the set of proposed guiding principles and could be seen to send the wrong message, particularly alongside the new proposed principle around Safety. |

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| 15. | Do you agree that the ‘structural separation’ principle should be retained as an operational guideline? Why / why not? |
| Yes agree that retaining this is sensible and it is far better suited to being an operational guideline |

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| 16. | Do you agree that the ‘clear chain of relationships’ principle should be retained as an operational guideline? Why / why not? |
| Yes it makes sense to retain the clear chain of relationships and provide for a mechanism for the DNCL to intervene in the relationships where necessary. |

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| 17. | Should the Panel consider any other principles? |
| The principles that have been proposed (and the feedback here about the Security, trust and safety one in particular) seem to provide good coverage.  |
| 18. | Is there anything else the Panel should bear in mind when making recommendations on the principles or operational guidelines for the .nz policies?  |
| It would be helpful for the Panel to consider ‘how’ the changes or recommendations should be implemented, including whether any stakeholders could be engaged further to strengthen the work.We anticipate that, should what is proposed go ahead, that this will mean significant change for InternetNZ/DNCL. The Classification Office would be happy to be engaged in discussions about any area of implementation that we may be able to assist with to assist with the change process. |

## Accessibility and openness of .nz domains

### The .nz policies are written only in English

* Option A: the current situation
* Option B: Make the policies available in te reo Māori as well as English
* Option C: Make the policies available in te reo Māori and take other accessibility measures like adding other languages over time according to how widely used they are

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| 19. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Agree with assessment of options  |
| 20. | Which option do you prefer? Why? |
| Preference for Option C – having policies in Te Reo and English – with the commitment to add other languages overtime is a really positive step and supports making .nz accessable.We do acknowledge that adding other languages over time would have a higher implementation cost than other options. We see that this is something that could slowly be added to over time to reduce initial overhead, whilst still showing progress. |

### 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? |
| Yes |
| 22. | Which option do you prefer? Why? |
| Option 3 – noting this is the most inclusive option. However, we understand that this would be more complex and costly to implement and can attract greater security risk. For those reasons, we would be supportive of option 2 – with a view to moving to option 3 if demand was high enough over time. In option 2, you will still need to work through security implications and should do so with an eye on protection for a future for option 3. |

### 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. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes – however, think that there could also be an option 2A. We support educating New Zealanders on who can hold a .nz – and see public education as an important component of how we collectively reduce harm and provide good public information. Any education campaign about who can hold a .nz could/should be framed within a broader set of messages about the .nz environment. |
| 24. | Which option do you prefer? Why? |
| To protect from harm and ensure that those misusing the .nz domains can be held accountable, we are most supportive of Option 3 where the applicant is required to have some legitimate presence or connection in NZ. Note – we see value in a public education campaign, regardless of what option is chosen. |

## 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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| 25. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| We believe that option C could be strengthened and pick up components of option D. We propose that adding the establishment of an ‘acceptable use guideline’ –that is advertised and provided for all registrants, that provides some principles and guidance about things that the DNCL may consider taking action on in relation to misuse or illegal activity through a .nz domain. This is potentially less ‘limiting to freedom of expression’ than what is proposed in Option D, but sets some expectations upfront – and includes notification that the DNCL will act on advice from trusted notifiers.  |
| 26. | Which of these options do you prefer? Why?  |
| We would support Option D – an acceptable use policy feels appropriate and sends the right message to those wanting to use .nz in our view. We do however, appreciate the potential concerns in relation to Option D so would support Option C – but expect that there is also some guidance provided on what is not acceptable (as noted above) |

### The interim emergency circumstances clause

* Option A: Allow the interim policy to lapse
* Option B: Make the interim policy permanent as it is currently phrased
* Option C: Modify the interim policy and make it permanent

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| 27. | Do you agree with our assessment of the options? Why / why not?  |
| Yes |
| 28. | Which of these options do you prefer? Why?  |
| We would not support Option A at all – we believe that some form of ability to intervene is important.We would strongly support Options B and C – the current clause could be strengthened, however we think it is useful as it stands. It is important in either Option B or C that there are some transparency and accountability measures put in place. |

### Domain name registration abuse

* Option A: Current situation
* Option B: Introduce data validation for all domain name registrations

#### Option C: Introduce data verification for high risk domain name registrations

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| 29. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 30. | Which of these options do you prefer? Why?  |
| The Classification Office sees Option C as the strongest to help to prevent harm – however appreciate that this would be the most resource intensive to implement and maintain. Option C feels like a good future focused option that, if implemented right, allows for change as the nature of use changes (with respect to ‘high risk’ definitions).The minimum we would support is Option B – with the ability to move to data verification where a risk or concern was identified. With either option, new operational policies or process will need to be developed and there will likely need to be good stakeholder engagement to ensure the best possible set of guidelines is developed and able to be maintained.  |

### Grace periods and domain tasting

* Option A: The current situation
* Option B: Removal of grace periods
* Option C: Adopt different policies towards new registration and renewal grace periods

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| 31. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Option A could be strengthened with updated policy and in line with the implementation of an acceptable use guide or policy (as noted in previous sections). |
| 32. | Which option do you prefer? Why?  |
| We support Option C as the strongest to prevent misuse and harm, however appreciate the limitations this may bring for registrants. We recommend reviewing the initial engagement process at the outset of registration to mitigate the risk that registrants make errors etc..  |

### Misleading, deceptive, and offensive domain names

* Option A: The current situation
* Option B: Introduce a ‘reserved and restricted names’ policy

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| 33. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 34. | Which of these options do you prefer? Why?  |
| Option B – noting that this provides the greatest protections, however appreciate that this will mean a significant compliance/additional work requirement.We recommend that the list of words or phrases (phrases are important to consider) could be developed and/or maintained through an external advisory group that includes industry, InternetNZ and suitable representatives such as the Chief Censor perhaps. This approach may mitigate the risk that the list is overly strict and provide some public assurance, can balance the freedom of expression requirements with harm mitigation – as well as reducing the overhead for InternetNZ. |

### 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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| 35. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 36. | Which option do you prefer? Why?  |
| We would support Option B or C. There should be some level of base requirement for security to protect the .nz domain. |

### Technology specific approach

* Option A: The current situation
* Option B: A ‘technology neutral’ approach to policy drafting replaces the current prescriptive approach

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| 37. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 38. | Which of these options do you prefer? Why?  |
| Option B is preferable – this provides for future proofing. This may however, mean that there is more work required internally for DNCL/InternetNZ to ensure that these policies are clearly operationally implemented according to the current technology stack. |

## 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? |
| Yes |
| 40. | Which of these options do you prefer? Why?  |
| We would support Option C – but recommend that an ‘exceptions policy/process’ is developed to provide flexibility for cases that don’t fit the criteria. |

## Enhancing privacy across the .nz domain name system

### Level of registrant data collected and stored

* Option A: The current situation
* Option B: Introduce different registrant profiles, requiring different levels of contact data to be collected for each.

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| 41. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 42. | Which of these options do you prefer? Why?  |
| Option B obviously provides the most protections from a privacy perspective.Option A doesn’t feel like it is appropriate to continue as is - adding some protections in is important. At the very least – all registrants need to be made aware of the discoverability of their personal data to enable them to make informed decisions. |

### 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? |
| Yes |
| 44. | Which option do you prefer? Why?  |
| Option B – though appreciate that this will create issues for people who have legitimate cause to look up that information and consider that perhaps another process could be put in place to allow people with a legitimate need to seek that information through DNCL. |
| 45. | Under the IRPO, which contact details do you think should be withheld from WHOIS? |
| Full contact details for individuals – such as full address (could list city/suburb instead)  |

### 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? |
| Yes – though note that this is dependent on which option is chosen in the above section for the IRPO.. |
| 47. | Which option do you prefer? Why?  |
| Option B or Option C (again dependent on which option is selected for IRPO)  |

## The .nz domain space and Māori

### Engaging with Māori in the policy-making process

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| 48. | Do you agree that following the Panel’s work, InternetNZ should take reasonable steps to engage with Māori when amending the .nz policies? Why / why not? |
| Yes. Engagement with Maori is a critical step in honoring the principles of Te Tiriti o Waitangi and will strengthen any proposals to take forward for the betterment of all New Zealanders.  |

### Building strong capability within InternetNZ to engage with Māori

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| 49. | Do you agree InternetNZ should ensure it has adequate capability to facilitate engagement with Māori? Why / why not? |
| Yes – this is an important area – Maori are the indigenous people of New Zealand, and therefore should be respected as such. The digital nature of our lives now impacts and affects Maori in different ways than it may do for pakeha and understanding this is important to be able to truly realise an inclusive future for .nz.  |

### Engaging with Māori on the issues that the Panel has identified

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| 50. | Are there any other .nz-related issues affecting Māori that you think should be considered? |
| There likely will be and it would be our view that consultation with Iwi will help to identify these areas. |

## Opportunities to enhance .nz growth and improve market operation

## The current flat wholesale fee structure limits innovation

* Option A: Flat wholesale fee, no rebates or incentives (Current situation)
* Option B: Enable variable wholesale pricing to Registrars
* Option C: Allow Registry to offer rebates to the registrant via the wholesale fee

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| 51. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 52. | Which of these options do you prefer? Why?  |
| Option B or C would seem to be more in line with the future focus – this is not an area that the Classification Office  |

## The scope of incentives to enhance market operation

* Option A: Do not incentivise registrars or registrants (the current situation)
* Option B: Allow registrar incentives to drive specific initiatives
* Option C: Require any incentive payment criteria to be designed to promote .nz policy goals

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| 53. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| No comment |
| 54. | Which of these options do you prefer? Why?  |
| No comment |

### Empowering registrants could improve market performance

* Option A: Current situation
* Option B: InternetNZ works with registrars to establish a statement of registrant rights which the DNC monitors and registrars are accountable for by annual monitoring

#### Option C: DNCL publishes expanded objective market information to better inform registrant choice eg. market share and renewal rates

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| 55. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| No comment |
| 56. | Which of these options do you prefer? Why?  |
| No comment |

### Improving the regulation of Resellers could enhance market operation

* Option A: The current situation
* Option B: Establish a two-tier registrar system which incorporates resellers
* Option C: Reduce the $3,000+GST registrar establishment fee for existing resellers as part of the proposed two-tier registrar system

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| 57. | 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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| 58. | Which of these options do you prefer? Why?  |
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## The Registry’s role in market activity

* Option A: No requirement on scope of registrar offering. Registry may not sell/market directly to customers (The current situation)
* Option B: The Registry defines minimum service/feature set all registrars must provide. The Registry may not sell/market directly to registrants. The Registry incentivises registrars to provide services it provides under agreed rules
* Option C: No requirement on scope of registrar offering. The Registry may sell/market directly to registrants under strict controls.

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| 59. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| No comment |
| 60. | Which of these options do you prefer? Why?  |
| No comment |

### Improving Registrar monitoring may enhance market operation

* Option A: The current situation
* Option B: Establish a Registrar Service Level Agreement System to enhance market operation.

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| 61. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| No comment |
| 62. | Which of these options do you prefer? Why?  |
| No comment |

### Greater industry data collection and publication could improve growth opportunities

* Option A: The current situation
* Option B: The Registry collects and communicates market information including customer segments, activity/utilisation and product use for industry to better understand and develop the .nz market

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| 63. | Do you agree with our assessment of the options? Why / why not? Are there viable options that we have not mentioned? |
| Yes |
| 64. | Which of these options do you prefer? Why?  |
| Option B is preferred – this information will be useful to those working in the various factions of internet safety/regulation to understand the lay of the land, hopefully leading to better engagement and interventions. Far too often people are working from anecdotal evidence and not understanding how the markets are operating. |

### Second level (2LD) market opportunities

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| 65. | Do you agree with our assessment of the issue? Why / why not? |
| No comment |
| 66. | Is there a role for additional second level domain names (moderated or not) within the .nz domain? If so, what domains in which area? |
| No comment |

## Other comments

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| 67. | Any other comments you would like to make.  |
| Thank you for the opportunity to provide a submission.We are supportive of the broad set of considerations taken into account when reviewing the policies for Internet NZ. We are particularly happy to see a focus on safety and concern for use of the .nz domains and hope that this is an area that continues to grow – recognising that InternetNZ and DNCL are independent and must maintain a set of independent views that are considerate of industry needs also.While we are not best placed to have specific commentary on commercial and market share options discussed, we are supportive of any attempts to encourage participation and provide benefit to New Zealanders.I would see value in a continuing engagement between my office and InternetNZ, specifically in relation to safety elements that may be implemented. |