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Submission to the
2015 Names Policy Panel
Responding to its
Draft Recommendations

By:

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Dear 2015 Names Policy Panel,

Thank you for the opportunity to submit a response to the Draft Recommendations.

Please find my comments attached.

Regards,

J. Selby

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DRAFT RECOMMENDATION 1A:

The Panel recommends in principle that .au should be opened up to direct registrations.

Response: This recommendation is not supported on the evidence provided.

There are eight reasons why the Names Panel's draft recommendation to open up the .au to direct registrations is flawed.

1. The importance of planning policies which carefully balance the interests of supply-side stakeholders and demand-side stakeholders

Given responsibility under auDA's management of the .au ccTLD to develop recommendations on names policy, the Panel faces issues somewhat akin to the zoning challenges facing the planning departments of local councils. Just as property developers and real estate agents (the supply side of the residential/commercial property industry) will lobby the local councils in support of land re-zonings for their own commercial interests, it is unsurprising to see the supply side of the .au Domain Name System lobbying the Panel for changes to be made which would benefit their own commercial interests, in this instance for the opening up of the .au to direct registrations, at the expense of demand-side stakeholders who would be compelled to defensively register additional (unwanted) domains.

Local councils face challenges in seeking to ensure that their constituents receive maximum benefit from the zoning choices they make as regulators. Excessively catering to the desires of the supply-side of the property industry leads to poor planning decisions. For example, the city of West, Texas had no effective zoning laws. This allowed houses to be built next to an existing fertilizer factory, which later exploded killing at least fifteen people.¹ Similar poor planning policies which place excessive focus upon supporting the interests of supply-side stakeholders have facilitated the over-development of "ghost towns" in China.² These are only two of many instances where supply-side stakeholders were able to extract profits for themselves in the short-term by shifting harms and costs onto demand-side stakeholders in the longer-term.

Whilst AuDA's membership structure is designed to include supply-class and demand-class memberships, these are not completely separate groupings. Employees of supply-side members (i.e. those paid to work for businesses profiting from collecting fees from the sale of each .au domain) are also eligible to be members of the demand-class. Consequently, auDA's Demand Class membership is not composed only of demand-side stakeholders. It also includes a significant number of supply-side stakeholders. This structural issue risks giving excessive power within auDA to those representing the interests of supply-side stakeholders. Given the current lack of evidence to support the Draft Recommendations and concerns about the methodological weaknesses affecting the Survey, the Panel risks being the equivalent of a local government planning department making poor planning recommendations

¹ Theodoric Meyer and ProPublica, 'Why Didn't Regulators Prevent the Texas Fertilizer Explosion?' *Scientific American* (April 25, 2013) <<http://www.scientificamerican.com/article/why-didnt-regulators-prevent-the-texas-fertilizer-explosion/>>

² Peter Calthorpe, 'The Real Problem with China's Ghost Towns' *Metropolis* (1 September 2013) <<http://www.metropolismag.com/Point-of-View/August-2013/The-Real-Problem-with-Chinas-Ghost-Towns/>>

by giving excessive weight to the interests of property developers and real estate agents.

2. The Draft Recommendations contains methodological flaws which undermine the validity of those recommendations

There appear to be two methodological flaws in the Names Policy Panel Report which preclude placing significant weight upon its Recommendations, particular in relation to Recommendation 1A. The first relates to a mixing of different data sources. The second relates to technological weaknesses in the survey which undermines the level of confidence in its results.

The methodology used to produce the recommendations in the Names Policy Panel's Report was flawed: those recommendations were based upon treating equally data sources which were not equal.³ Whilst those making policy submissions publicly identify themselves and can therefore be categorised relatively accurately as demand-side stakeholders or supply-side stakeholders, the details of the survey participants have not been provided. The survey itself did not appear to collect demographic data from its participants, so it is not possible to determine which survey participants represented the interests of supply-side stakeholders and which represented the interests of demand-side stakeholders. Thus, it is impossible to determine the weight that should be given to the responses provided by the participants in the survey. The Panel should not have mixed the responses from those identified stakeholders making policy submissions with those unidentified stakeholders who answered the survey (especially in light of my second methodological concern, set out below).

Online surveys and polls about controversial topics are commonly gamed by representatives of different stakeholder groups.⁴ This survey had weak protections against being gamed by supply-side stakeholders, who have a vested interest in enlarging the perceived level of support for direct registrations. The survey appears to have required only the provision of a name and an email address (both of which can be easily spoofed, e.g. Jane Doe, janedoe@hotmail.com). The random checking of respondents by SurveyMonkey sending emails to them is not sufficient to overcome this weakness and there was no indication in the Panel's Report as to how many (if any) such validity checks were actually made. The survey limited participants to making only one submission per IP-address, but this provides little real-world protection against motivated and internet-savvy stakeholders who can skew the survey results through vote-stuffing by either a) renting a bot-net to use to send submissions from many IP addresses; b) use Amazon's Mechanical Turk; c) re-connect multiple times to a VPN to cloak their originating IP address; or d) simply ask their employees to each make a submission. By definition, as this is a survey about internet regulation, there is a high risk that stakeholders motivated to game the results of the survey would be sufficiently internet-savvy to be able to apply any of the four techniques identified above (or other similar techniques) to bypass the insufficient security protections used in the survey.

³ Mark Douma & Joanne Nobile, 'The Fallacy of Online Surveys: No Data Are Better Than Bad Data' (2010) 15(1) *Human Dimension of Wildlife* 55.

⁴ Ibid; Alma Cole, Michael Mellor & Daniel Noyes, 'Botnets: The Rise of the Machines' (2007) *Proceedings of the 6th Annual Security Conference* (April 11-12, Las Vegas)
<<http://www.isy.vcu.edu/~gdhillon/Old2/secconf/secconf07/PDFs/13.pdf>>

3. A fuller debate is needed over the normative goal of the .au ccTLD

The Names Policy Panel cited increases in the volume of registrations in New Zealand and the UK after the introduction of direct registrations as a justification for introducing direct registrations into the .au ccTLD. However, an increased volume of registration does not indicate overall benefits from the policy change for the demand-side stakeholders (i.e. Internet users). Rather, a normative goal of increasing the rate of the volume of registrations in a TLD is only beneficial to those supply-side stakeholders who make profits from selling registrations (e.g. AusRegistry, the parent company of which was recently acquired by the US-based NeuStar Inc. for \$A118.5m. As Neustar Inc is listed on the New York Stock Exchange, it is unsurprising that it desires to boost its quarterly profits and to recoup its purchase price by promoting a policy which it hopes would increase its revenues).⁵

4. There is insufficient evidence to demonstrate the “Superiority of Shorter Names”

The Names Policy Panel’s strongest rationale for recommending direct registration was the claim that shorter domains are “more appealing and more memorable”. This is not supported by the evidence in the Australian context – the graph on the top of p15 of AusRegistry’s “Behind the Dot: State of the .au Domain 2015” report⁶ shows a significant decline in the percentage of demand-side stakeholders who chose to register in TLDs outside of Australia on the basis that they offered “Shorter URLs”. If there was actual pent-up demand-side stakeholder demand for direct registrations, given the availability of direct registrations in other jurisdictions (such as .UK and .NZ), that percentage should have grown over time. Instead, according to AusRegistry’s own data, that percentage has shrunk from ~11% in 2014 to ~5% in 2015.

The Names Policy Panel’s report on p6 claimed that evidence from registrant behaviour in the .nz ccTLD supported the claim of the superiority of shorter names. Unfortunately, this claim contains a flawed assumption: that of mistaking a correlation for a causation.⁷ Whilst the statistical evidence cited by the Panel in its footnote 1 does show a correlation between the introduction of direct registration and a decline in demand for the registration of .co.nz domains, this is not evidence that the introduction of direct registrations *caused* the decline in the rate of registrations of .co.nz 3LDs. It may be a contributing factor but, without more detailed analysis, the extent to which it is a significant factor is unclear.

Consequently, there appears to be weak evidence to support a claim that shorter names are superior. Without further research and analysis, the claim presented by the Names Policy Panel in support of direct registration lacks weight.

⁵ For a similar example of how MelbourneIT’s incentives changed after it was floated on the Australian Stock Exchange, see: John Selby, ‘Market Disclosure and Governance Challenges When Floating University Research on the Stock Market: The Float of Melbourne IT Limited by the University of Melbourne’ (2015) 23(2) *Journal of Law, Information and Science* 1.

⁶ This report appears to be more of a sales document promoting direct registration than an independent analysis of the .au ccTLD.

⁷ For a clear (and often hilarious) demonstration of the danger of mistaking correlations for causation, see: <<http://www.tylervigen.com/spurious-correlations>>

5. There is insufficient evidence to support the claim that Direct Registration would offer a “Wider Choice and appeal to Registrants, especially individuals”

I acknowledge that the .id.au 2LD does not appear to attract many registrants. However, the fact that one .au 2LD is unpopular is nowhere near a sufficient justification for the introduction of direct registration. The Panel has not provided any evidence from the .NZ or .UK that direct registration has been more popular with individuals than previous 2LDs designed for individuals (such as .geek.nz, .gen.nz and .kiwi.nz).

If the Names Policy Panel wishes to encourage individuals to register .au domains, perhaps it could propose to the auDA Board that they instruct a future Names Policy Panel to undertake an independent study asking individuals why they are not using the existing .id.au 2LD and propose a new 2LD within which Australian individuals could register 3LDs. This is a matter which should be considered separately and therefore this claim by the Names Policy Panel cannot (without actual evidence) be a justification to support the introduction of direct registration.

6. There is insufficient evidence to demonstrate that Direct Registration “Add[s] value for everyone”.

The Names Policy Panel should recommend policy changes only after it has collected and analysed substantial evidence to determine the likely effect of those recommended policy changes, i.e. evidence-based policy. The Names Policy Panel’s Report lacks evidence to support its Draft Recommendation 1A. It proposes “taking a long-term view” by introducing direct registration without having evidence to support that policy change. This is the opposite of evidence-based policy (where policy changes are only made *after* evidence to support a change has been collected and thoroughly analysed).

On the contrary, evidence from the pilot study I undertook (see Appendix 1) of usage of direct registered domains in .NZ and .UK indicated that there was negligible benefit to demand-side stakeholders (i.e. Internet users) from the introduction of direct registration in those ccTLDs. Rather, the actions of Internet users suggested that most direct registrations were purely defensive and did not act as a platform for the offering of new services over those already offered under the existing 3LDs. Instead, most direct registrations either re-directed Internet users to the existing 3LDs (indicative of the sunk-cost value invested by registrants in marketing their existing 3LDs to Internet users), or were mirrors of the content hosted on their existing 3LDs (indicative of direct registration being an “unnecessary tax” on demand-side stakeholders). Significant further independent research is required before the validity of the claim that “Direct Registration add[s] value for everyone” can be ascertained.

7. Changes to auDA’s Names Policy have never been a “natural evolution”

The Names Policy Panel claimed that incremental changes to the regulation of the .au ccTLD have been a “natural evolution of the namespace” and that allowing direct registration would be “removing an obstacle” to that natural evolution. I would argue that this is, at best, a “Whig Interpretation of History” (i.e. a claim about the past as

the origin or precursor of the present⁸). Having written my PhD dissertation on the history of the regulation of the .au ccTLD⁹, I would argue that there has never been a “natural evolution of .au”. Instead, changing the status quo for the regulation of the .au ccTLD has been a hard-fought struggle within and between active supply-class stakeholders and active demand-class stakeholders, who deployed financial, technical and political resources in support of different strategies in an attempt to achieve their goals. To claim that these conscious acts by supply-side stakeholders and demand-side stakeholders constitute a “natural evolution” is either a deliberately misleading rhetorical device, or a significant mis-reading of the historical evidence.

In particular, even as far back as the mid-1990s, supply-side stakeholders have repeatedly sought to implement strategies designed to loosen protections designed to protect the interests of demand-side stakeholders.¹⁰ Supply-side stakeholders enjoy a significant structural advantage over demand-side stakeholders in these contests. There are far fewer supply-side stakeholders, so they enjoy a greater concentration of interests than the dispersed interests of the millions of demand-side stakeholders (i.e. lower coordination costs). Supply-side stakeholders are repeat players in multiple rounds of contests over the regulation of the .au ccTLD, whereas demand-side stakeholders are far more likely to be single-time players in those contests (having registered their domain, most demand-side stakeholders are rationally ignorant, paying very little attention to subsequent .au policy decisions). Civil-society groups, such as ACCAN, can attempt to collectively represent a portion of the demand-side stakeholders - it should be noted that ACCAN’s submissions to the Names Policy Panel indicated that it was opposed to the introduction of direct registration.¹¹

8. Introducing Direct Registrations would not be a “Minor Change” to the regulation of the .au ccTLD

Contrary to claim made in the Names Policy Panel’s report on p7, direct registration is neither a “natural evolution”, nor is it a “minor change”. The shift from a hierarchical regulatory system for the .au ccTLD to a flat regulatory system for the .au ccTLD will have long-lasting ramifications for the Australian Internet community. Such a policy change will impose very significant costs upon existing .au 3LD registrants (particularly in the .com.au 2LD, where it may impose hundreds of millions of dollars in additional, unnecessary marketing expenses across the economy and cause the writing down of billions of dollars in existing brand value for 3LDs). It is likely to result in a direct transfer of wealth from demand-side stakeholders to supply-side stakeholders. It will severely limit the ability of future auDA Boards and Names Policy Panels to introduce new 2LDs, similar to how ICANN has introduced new gTLDs.

⁸ Herbert Butterfield, *The Whig Interpretation of History* (London, 1931); Adrian Wilson and T.G. Ashplant, ‘Whig History and Present-Centred History’ (1988) 31(1) *The Historical Journal* 1.

⁹ John Selby, ‘A New Institutional Economics Analysis of the History of the Regulation of the .au ccTLD from 1986 to 2002’ (University of New South Wales, 2013).

¹⁰ *Ibid.*

¹¹ ACCAN, *Submission to auDA Names Policy Panel* (4 June 2015)

<<http://www.auda.org.au/assets/pdf/sub-accan4.pdf>> and <http://www.accan.org.au/our-work/submissions/1110-direct-registrations-draft-recommendations-submission> (30 September 2015).

Conclusion:

The current report suffers from a lack of evidence to support the claims made by the Names Policy Panel in favour of direct registration. On the basis of that lack of evidence, it arguably would be unwise for the auDA Board to introduce direct registration into the .au ccTLD at this stage. The Names Policy Panel is encouraged petition the auDA Board to commission *independent* research to collect evidence as to the advantages and disadvantages of direct registration so that a more informed discussion amongst demand-side stakeholders and supply-side stakeholders on this issue can occur in the future.

DRAFT RECOMMENDATION 1B:

The Panel recommends that the same policy rules which currently apply in the existing 2LDs should also apply to direct registrations

Response: The Names Policy Panel should not introduce direct registration at this stage. However, if the Names Policy Panel decides to introduce direct registration, it should apply the same policy rules to direct registrations which currently apply in the existing 2LDs.

Direct registration limits the existing ability of different registrants sharing the same name to co-exist within the .au ccTLD. Auctions are not an appropriate method for determining disputes between potential registrants as that process favours the wealthy and enables the supply-side stakeholders (or regulator) to extract excessive profits from those demand-side stakeholders. The issue of recognition of the rights of existing registrants would be likely to create a significant number of disputes between potential registrants, offering benefits to lawyers and dispute resolution providers at the expense of demand-side stakeholders.

If the Names Policy Panel decides to recommend that auDA's Board introduce direct registration, it also needs to recommend a lengthy, significant and meaningful process for demand-side stakeholders to determine their preferred process through which such a significant change would be introduced.

DRAFT RECOMMENDATION 2A:

Subject to draft recommendations 2B and 2C below, the Panel recommends that the eligibility and allocation criteria for open 2LDs be retained in their current form.

Response: I agree.

DRAFT RECOMMENDATION 2B:

The Panel recommends that the fixed two year licence period be changed to a variable 1-5 year period (ie. registrants could choose to register their domain name for 1, 2, 3, 4 or 5 years).

Response: I agree.

An adjustment from fixed licence periods to flexible licence periods would provide greater benefits to demand-side stakeholders. However, too much flexibility (such as

the NZ model of 1-month to 10-yr registrations) appears to be detrimental. Yearly licence periods of 1, 2, 3, 4 or 5 years provides a reasonable balance between the interests of supply-side and demand-side stakeholders.

DRAFT RECOMMENDATION 2C:

The Panel recommends that auDA and/or AusRegistry should make the appropriate changes to the policy and/or registry database fields to reflect the nationalised business names registration system, ensuring that there is no disadvantage to registrants.

Response: I agree.

DRAFT RECOMMENDATION 3A:

The Panel recommends that the Reserved List Policy be retained in its current form.

Response: I agree.

DRAFT RECOMMENDATION 3B:

The Panel recommends that the Prohibition on Misspellings Policy be retained, but that auDA should revise the audit list provisions to provide more flexibility in the way the policy is enforced.

Response: I agree, subject to there being sufficient evidence gathering and analysis as to how such “flexibility” would be implemented in practice. It is important to ensure that avenues for abuse of any proposed changes be thoroughly modelled prior to such changes being implemented.

Appendix 1:

Pilot Study Analysis of the Benefits of the Introduction of Direct .uk Domain Registrations for UK Internet Users

Rank ¹² (rank in Alexa Top-100)	Existing 3LD .uk Domain	.uk domain directly registered ¹³ by same entity?	.uk resolves ¹⁴ ?	.uk site has any content ¹⁵ ?	Content identical to .co.uk site	Content substantially differed to .co.uk site	Did the Introduction of Direct .uk Domain Registration Add Any Value for .uk Internet Users?
1 (1)	google.co.uk	yes	No	No	N/A	N/A	No
2 (5)	amazon.co.uk	Yes	No	No	N/A	N/A	No
3 (6)	bbc.co.uk	Yes	No	No	N/A	N/A	No
4 (7)	ebay.co.uk	yes	No	No	N/A	N/A	No
5 (13)	dailymail.co.uk	yes	No	No	N/A	N/A	No
6 (18)	telegraph.co.uk	Yes	No	No	N/A	N/A	No
7 (19)	rightmove.co.uk	Yes	Yes	No – registrar info only	No	Registrar info only	No

¹² Data sourced from: .uk domains within the 100 most most visited domains by UK Internet users listed on 25 May at <http://www.alexa.com/topsites/countries/GB>

¹³ Data sourced from: <http://www.dotuklaunch.uk/whois/lookup>

¹⁴ Data sourced from: <http://www.isup.me>

¹⁵ URL tested in both Mozilla Firefox and Internet Explorer

Rank ¹² (rank in Alexa Top-100)	Existing 3LD .uk Domain	.uk domain directly registered ¹³ by same entity?	.uk resolves ¹⁴ ?	.uk site has any content ¹⁵ ?	Content identical to .co.uk site	Content substantially differed to .co.uk site	Did the Introduction of Direct .uk Domain Registration Add Any Value for .uk Internet Users?
8 (30)	Gov.uk	All Government websites were merged into gov.uk, which is a 2LD					No
9 (35)	tripadvisor.co.uk	Yes	Yes	No - blank	N/A	N/A	No
10 (37)	lloydsbank.co.uk	Yes	No	No	N/A	N/A	No
11 (39)	argos.co.uk	Yes	Yes	No – redirects to argos.co.uk site	Yes	No	No
12 (45)	hsbc.co.uk	Yes	No	No	N/A	N/A	No
13 (47)	national-lottery.co.uk	Yes	No	No	N/A	N/A	No
14 (50)	independent.co.uk	Yes	No	No	N/A	N/A	No
15 (51)	autotrader.co.uk	Yes	Yes	No – redirects to	Yes	No	No

Rank ¹² (rank in Alexa Top-100)	Existing 3LD .uk Domain	.uk domain directly registered ¹³ by same entity?	.uk resolves ¹⁴ ?	.uk site has any content ¹⁵ ?	Content identical to .co.uk site	Content substantially differed to .co.uk site	Did the Introduction of Direct .uk Domain Registration Add Any Value for .uk Internet Users?
				autotrader.co.uk			
16 (52)	santander.co.uk	Yes	Yes	Blank	No	Yes – Blank	No
17 (55)	mirror.co.uk	Yes	No	No	N/A	N/A	No
18 (56)	Indeed.co.uk	Yes	No	No	N/A	N/A	No
19 (57)	Halifax-online.co.uk	No	No	No	N/A	N/A	Undetermined
20 (59)	barclays.co.uk	Yes	No	No	N/A	N/A	No
21 (61)	zoopla.co.uk	Yes	Yes	No – redirects to zoopla.co.uk	Yes	No	No
22 (71)	Hellou.co.uk	No	No	No	N/A	N/A	Undetermined

Rank ¹² (rank in Alexa Top-100)	Existing 3LD .uk Domain	.uk domain directly registered ¹³ by same entity?	.uk resolves ¹⁴ ?	.uk site has any content ¹⁵ ?	Content identical to .co.uk site	Content substantially differed to .co.uk site	Did the Introduction of Direct .uk Domain Registration Add Any Value for .uk Internet Users?
23 (73)	Talktalk.co.uk	Yes	No	N/A	N/A	N/A	No
24 (77)	Nationwide.co.uk	Yes	Yes	No – registrar info only	N/A	N/A	No
25 (94)	Nhs.uk	Government website. ¹⁶					Possibly Yes
26 (99)	Aol.co.uk	No	No	N/A	N/A	N/A	Undetermined

¹⁶ This appears to not be in compliance with the www.gov.uk policy to bring all government websites within that gov.uk domain (see Row 8 above). See: <https://www.gov.uk/> which states “The websites of all government departments and many other agencies and public bodies have been merged into GOV.UK.”

Pilot Study Analysis of the Benefits of the Introduction of Direct .nz Domain Registrations for NZ Internet Users

Rank¹⁷ (rank in Alexa Top-100)	Existing 3LD .nz Domain	.nz domain directly registered¹⁸ by same entity?	.nz resolves¹⁹?	.nz site has any content²⁰?	Content identical to .co.nz site	Content substantially differed to .co.nz site	Did the Introduction of Direct .nz Domain Registration Add Any Value for .nz Internet Users?
1 (1)	Google.co.nz	No - conflicted	No	N/A	N/A	N/A	No
2 (5)	Trademe.co.nz	Yes	No	No	N/A	N/A	No
3 (6)	Stuff.co.nz	No - conflicted	No	N/A	N/A	N/A	No
4 (7)	Nzherald.co.nz	No - conflicted	No	N/A	N/A	N/A	No
5 (12)	Anz.co.nz	No - conflicted	No	N/A	N/A	N/A	No
6 (15)	Westpac.co.nz	Yes	No	No	N/A	N/A	No
7 (16)	Asbbank.co.nz	Yes	No	No	N/A	N/A	No

¹⁷ Data sourced from: .nz domains within the 100 most popular domains visited by New Zealand Internet users listed on 25 May at <http://www.alexa.com/topsites/countries/NZ>

¹⁸ Data sourced from: <http://www.domainz.net.nz/whois.asp>

¹⁹ Data sourced from: <http://www.isup.me>

²⁰ URL tested in both Mozilla Firefox and Internet Explorer

Rank 17 (rank in Alexa Top- 100)	Existing 3LD .nz Domain	.nz domain directly registered ¹⁸ by same entity?	.nz resolves ¹⁹ ?	.nz site has any content ²⁰ ?	Content identical to .co.nz site	Content substantially differed to .co.nz site	Did the Introduction of Direct .nz Domain Registration Add Any Value for .nz Internet Users?
8 (18)	Kiwibank.co.nz	No - conflicted	No	N/A	N/A	N/A	No
10 (23)	Asb.co.nz	Yes	No	N/A	N/A	N/A	No
11 (28)	Bnz.co.nz	Yes	No	N/A	N/A	N/A	No
12 (330)	Lrd.govt.nz	Yes	Yes: (govt.nz is a 2LD); No: Lrd.nz				No
13 (40)	School.nz	Yes	Yes (school.nz is a 2LD)				No
14 (41)	Seek.co.nz	No - conflicted	No	N/A	N/A	N/A	No
15 (48)	Airnewzealand.co .nz	Yes	No	N/A	N/A	N/A	No
16 (49)	Realestate.co.nz	No - conflicted	No	N/A	N/A	N/A	No
17 (53)	Thewarehouse.co .nz	Yes	Yes	Registrar Placehold er only	No	Yes	No

Rank 17 (rank in Alexa Top- 100)	Existing 3LD .nz Domain	.nz domain directly registered ¹⁸ by same entity?	.nz resolves ¹⁹ ?	.nz site has any content ²⁰ ?	Content identical to .co.nz site	Content substantially differed to .co.nz site	Did the Introduction of Direct .nz Domain Registration Add Any Value for .nz Internet Users?
18 (57)	Nzpost.co.nz	No - conflicted	No	N/A	N/A	N/A	No
19 (61)	Auckland.ac.nz	No - conflicted	No	N/A	N/A	N/A	No
20 (62)	Realenz.co.nz	No - conflicted	No	N/A	N/A	N/A	No
21 (64)	Spark.co.nz	Yes	Yes	Redirects to co.nz	Yes	No	No
22 (66)	Business.govt.nz	No	Yes: (govt.nz is a 2LD); No: business.nz				no
23 (68)	Tripadvisor.co.nz	No - conflicted	No	N/A	N/A	N/A	No
24 (72)	Mylotto.co.nz	No - conflicted	No	N/A	N/A	N/A	No
25 (73)	Vodafone.co.nz	No - conflicted	No	N/A	N/A	N/A	No
26 (75)	3news.co.nz	Yes	Yes	Redirects to .co.nz	Yes	No	No
27 (79)	1-day.co.nz	Yes	Yes	Redirects to .co.nz	Yes	No	No

Rank 17 (rank in Alexa Top- 100)	Existing 3LD .nz Domain	.nz domain directly registered ¹⁸ by same entity?	.nz resolves ¹⁹ ?	.nz site has any content ²⁰ ?	Content identical to .co.nz site	Content substantially differed to .co.nz site	Did the Introduction of Direct .nz Domain Registration Add Any Value for .nz Internet Users?
28 (83)	Geekzone.co.nz	Yes	Yes	Redirects to .co.nz	Yes	No	No
29 (84)	Mightyape.co.nz	No - conflicted	No	N/A	N/A	N/A	No
30 (96)	Pricespy.co.nz	Yes	Yes	Parked by Registrar	No	No	No
31 (98)	Pbtech.co.nz	Yes	Yes	Redirects to .co.nz	No	No	No
32 (100)	Nzta.govt.nz	No	Yes (govt.nz is a 2LD); No: nzta.nz				No