

**IDN Sunrise Registration Draft Policy - Submission**

**From:** A J Park

**Received:** August 21 2009

This submission is made on behalf of AJ Park. We are an intellectual property law firm and act for a number of local and international companies and individuals who are registrants of .nz domain names. Thank you for giving us the opportunity to comment on the Draft Policy for Sunrise Registration Period.

We support the principal of a sunrise period before the general release of IDNs in the .nz space. Subject to giving enough notice of the finalisation of the policy, we believe that the process and timeframes in the draft are adequate to protect the rights of existing domain name/trade mark owners.

Ideally we would like to see a transparent process where sunrise applications were searchable, and an objection/opposition process available, rather than just the random allocation system proposed in clause 3 of the Process. However, we understand that the practicalities may not make the setting up of such a system worthwhile. Trade mark owners will still presumably be able to rely on the DRS in relation to IDN registrations, including sunrise IDN registrations.

Kind Regards,

AJ Park

Damian Broadley  
Partner  
A J Park