

Zone Transfer Policy Review Submission

From: SearchNZ (Matt Sullivan)
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With regard to the existing Zone Transfer Policy located at:

http://dnc.org.nz/content/zone_transfer.pdf

and to the Call for Public Comment located at:

http://dnc.org.nz/content/zone_transfer_policy_review.pdf

on behalf of SearchNZ we would like to submit the following comments.

Foreword and brief history of SearchNZ

SearchNZ is a 'crawling' (or 'indexing') Web search engine which crawls all available web sites within the New Zealand web space. Visitors to SearchNZ are able to quickly locate relevant information contained within these indexed web pages. Search query results provide short descriptions from each matching page along with links back to the original Web sites. Periodically SearchNZ revisits each web site to obtain the latest information.

As a companion to its primary web search function SearchNZ has always provided a Domain Name Search. This allows a limited full text fuzzy search on the .nz name-space. Names are listed along with links to associated web sites where appropriate. The SearchNZ Domain Search facility provides a valuable research tool to Internet users searching for suggestions in choosing a new domain, locating hard to find domains, finding variations on domain names and other legitimate uses.

The facility is used by many thousands of New Zealand visitors per month and we submit that it is a useful addition to the New Zealand Internet.

SearchNZ honors all accepted mainstream standards for indexing control such as the "The Robots Exclusion Protocol" and the "The Robots META tag". Additionally SearchNZ implements cache control META tags which enable web site owners to prevent the display of cached copies of their web pages.

More information regarding the "The Robots Exclusion Protocol" and the "The Robots META tag" can be found at <http://www.robotstxt.org/>

Unlike other major search engines SearchNZ has a completely New Zealand bias and implements with reasonable tolerance strict checks to ensure that the results it provides are New Zealand oriented.

SearchNZ is FREE. It is provided as a public service to New Zealand Web site owners by NZCity to help fulfill its goal of promoting Kiwi Web sites to New Zealanders. Being listed with SearchNZ gives Kiwi Web site owners significant free exposure for their products and services.

SearchNZ has been in operation since 1997 and is New Zealand's largest domestic search engine.

It is proudly 100% New Zealand owned and operated.

We take our position as a senior, stable and responsible member of the New Zealand Internet community seriously. We feel that any decision to remove access to the .nz zone file would significantly detract from the facilities that SearchNZ provides and ultimately detrimental to the wider New Zealand Internet community.

With regard to the Call for Public Comment it is our view that ...

1. Should any organisation outside the registry company be permitted to obtain a copy of the .nz zone file?

Yes. The Zone Transfer Policy should define the minimum parameters an Applicant must meet in order to demonstrate a legitimate use. Any organisation able to demonstrate a legitimate use should be permitted access to the .nz zone file.

In short, it should clearly state the terms under which such access may take place, the conditions within which access may be revoked (with and without notice) and set well defined boundaries regarding the acceptable use and or republication of any derived information.

All applications should pass through an appropriate review process before approval and be subject to periodic review.

Failing agreement that access to the .nz zone file will continue then alternative options should be considered such as regulated and filtered versions of the information based on domain holder preferences. This may well lead to the creation of separate policy or access process as (to our knowledge) this functionality is not available in the current SRS implementation.

SearchNZ would appreciate the opportunity to submit further oral and written submissions should any decision to change the status quo be forthcoming.

2. If organisations are permitted to obtain a copy of the .nz zone file, what criteria should be in place to assess whether their use of the zone file is appropriate?

At a minimum some brief technical documentation should be required as a basis for assessment. This may not need to be a substantial work but merely sufficient to describe the process for which the data is required and to what extent (if any) republication of the data will occur.

In particular, if republication of the data is to occur in electronic format (via a web server for example) any manipulation of the data performed as a result of user interaction should be detailed in terms of both the types of manipulation and the expected outputs. Any such manipulations and or outputs must be within policy parameters.

In many cases common sense will most likely prevail.

3. Should authorised registrars automatically be able to receive a copy of the .nz zone file?

Not automatically. Registry data is functionally separate from the .nz zone file. Access to this data is not an operational requirement for a registrar.

However, a suitably complete application within the boundaries of the governing Zone Transfer Policy should not necessarily be summarily dismissed either.

4. How frequently should copies of the .nz zone file be available to any approved organisations?

At minimum no more frequently than the current zone push interval and possibly with some acceptable delay with respect to any republication of new information.

In any case the minimum frequency and any required republication delay should not add additional operational complexity to existing SRS operations. That is to say, it should not be necessary to engineer, re-engineer or otherwise create additional processes to facilitate access when perfectly good mechanisms already exist and are proven.

Of course this must remain provisional to the existing policy stipulation that any such access must not place undue load on the SRS systems.

5. What information, if any, should any party receiving the .nz zone file be able to make public?

Only such information as that which is within the public domain and with reasonable limitations.

Such limitations might include:

- In the case of republished aggregate data:
 - a. volume and nature of results
- In the case of republished aggregate data where user interaction is possible:
 - a. wild card queries
 - b. volume and nature of results
 - c. total number per interval and or rate of queries

6. Does the release of the .nz zone file have a negative impact on the security of the information held?

No. The information contained within the .nz zone file is already publicly available in various ways at an individual zone name level. The .nz zone file does not contain the type of contact rich information that is commonly associated with WHOIS system data but is limited to zone names and name server records.

The primary concern must be the general release of aggregate zone data and the potential for subsequent malicious use of such data (e.g. UCE). The Zone Transfer Policy should place sufficient limits (such as those detailed in 5. above) on any release of aggregate data sufficient to dilute its usefulness in this way.

Additional comments

SearchNZ takes an active approach to misuse of its services and has a strong Anti SPAM policy.

Any attempt to:

- include a Web site (or copies) in the engine more than once,
- submit multiple domain names for the same Web site,
- submit 'doorway' or 'gateway' pages, 'hidden' links and/or unreadable text,
- use an automated tool to submit a URL or monitor rankings,
- submit pages with elements designed to mislead search engine indexers,
- any other attempt to artificially manipulate the database (note that this includes but is not limited to, any suspected attempt to collect data for malicious use)

will result in all entries being removed without notice and where appropriate further action to be taken as permitted by New Zealand law.

SearchNZ has always maintained an open and willing attitude towards working with both the SRS and the DNC to ensure that our use of the NZ zone data is within acceptable parameters. We enforce and monitor restrictions on the number of queries made in a given timeframe, the number of results displayed and the nature of user interaction against the zone data (e.g. we do not allow wild card queries within the Domain Search).

In the history of SearchNZ there has not been a single incident that would suggest that our services have been abused for malicious purposes such as generating UCE.

We feel that SearchNZ provides a valuable free promotional and research oriented tool for New Zealanders and people interested in New Zealand, its people, culture, history, politics and the many other great things there are to discover about or in New Zealand.

With the above in mind we invite those involved with this review to visit SearchNZ and put it to the test.

For general SearchNZ queries:

<http://www.searchnz.co.nz/>

For SearchNZ Domain Search queries:

<http://www.searchnz.co.nz/domains/>

For general information regarding inclusion in SearchNZ:

<http://www.searchnz.co.nz/addsite/>

Information for Webmasters;

<http://www.searchnz.co.nz/webmasters/>

Matt Sullivan
SearchNZ