

19 November 2008

Archives New Zealand
Attn: Stephen Clarke
PO Box 12 050
Wellington
Emailed to: stephen.clarke@archives.govt.nz

Dear Stephen,

Re: *Submission on Digital Continuity Strategy Consultation Draft.*

This submission is from Internet New Zealand (InternetNZ), and is in response to the call for submissions from Archives New Zealand on its *Digital Continuity Strategy Consultation Draft*.

InternetNZ is a membership-based not-for-profit organisation responsible for the administration of the .nz domain name system. Our mission is to protect and promote the Internet for New Zealand; we advocate the ongoing development of an open and uncaptureable Internet, available to all New Zealanders.

I. General Position:

I.1 InternetNZ supports the vision for digital continuity laid out in the *Digital Continuity Strategy Consultation Draft* and commends the seriousness with which Archives New Zealand is taking the issue of digital data preservation.

I.2 The importance of properly storing and managing digital information over time cannot be understated. Information created digitally, including that created in the public sector, is being produced at a phenomenal rate and may be irretrievably lost if protective measures aren't taken.

I.2 InternetNZ agrees that public sector digital information should be preserved and maintained for as long as it is needed and that that information must remain secure, tamper proof and free of technological rights restrictions.

I.3 In respect to the question of long term storage of digital records and information systems procurement InternetNZ has no view. We do note however that some countries regulate what information systems can be used, such as in South Australia where a panel decides on the EDRS systems that public sector agencies can make use of. Archives New Zealand may wish to consider this approach in the interests of long term inter-agency interoperability.

2. Open Formats

2.1 Requiring the use of open technology formats in public-sector record keeping would be useful and we encourage Archives New Zealand to thoroughly explore the long term accessibility and interoperability benefits that these offer in the framework of standards and guidance it intends developing.

2.2 If history is taken as a guide, we can be reasonably certain that some proprietary formats will be difficult to read in the future. For instance, WordStar TXT format and Microsoft Works WPS format can both be converted, but converters are required, and finding and installing the converters is likely to be tricky or impossible for the non-technical user.

2.3 Therefore Archives NZ should either:

- provide conversion at time of retrieval to current open standards formats for data held in legacy or proprietary formats; or
- convert the data to open standards formats at the time of archival.

3. Harmonise Initiatives

3.1 InternetNZ notes that The National Library undertook a web harvest of the entire .nz domain in October 2008, harvesting 4.1 terabytes of data from 105 million URLs.

3.2 InternetNZ encourages Archives New Zealand to coordinate with and look to leverage existing digital preservation initiatives such as that carried out by The National Library (particularly their NDHA framework) and to identify good standards of digital archiving practice being conducted elsewhere in government.

3.3 The extent of the web harvest, which ignored “robots.txt” caused considerable consternation among New Zealand network operators who felt that the National Library could have better notified the technical community in advance of the harvest, and that such a harvest should not have been across international connections but performed within New Zealand.

3.4 InternetNZ asks that Archives New Zealand notifies and coordinates with the New Zealand Network Operators Group (NZNOG) before undertaking any archiving of information contained on the public Internet such as websites and wikis.

We are available for any further comment.

Regards,

A handwritten signature in black ink, appearing to read "A. Davidson". The signature is written in a cursive style with a large initial "A" and a horizontal line under the name.

Keith Davidson
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InternetNZ

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