

Peter Tonoli  
Via Email: peter+auda@metaverse.org

Saturday, 30 November 2019

.au Domain Administration Limited  
L 17, 1 Collins St,  
Melbourne, Vic, 3000  
Via Email: policy.review@auda.org.au

I appreciate the opportunity to provide this submission in relation to .au Licensing Rules and .au Namespace Implementation Policy Consultation.

From a brief review of the proposed licensing rules, and participation in an auDA facilitated consultation, I have the following recommendations:

- Registrants, who have .au domain names, which meet current eligibility criteria, however do not meet proposed criteria (such as the *exact match* criteria) must not be put at a disadvantage, nor should the new eligibility criteria affect current registration.  
Current registrations were made in good faith, and there was no contemplation of the new requirements when registrations were made. Retrospectively applying the new criteria on existing registrations could have a significant negative impact on registrants, and there would be negative imputations on the policy stability of the .au domain space.
- The cut-off date for determining .au priority, for direct registration, should be six months prior to the proposed launch date of direct registration, as recommended by the auDA Policy Review Panel, not 4 February 2018, which is currently proposed under the previously abandoned direct registration process.
- To ensure the utmost transparency, and to confirm that protections in the proposed policy are effective, auDA should create quarterly transparency reports relating to license cancellations or suspensions due to requests under the proposed 2.17 Public Interest Test. It is recommended that these transparency reports quantitate successful and unsuccessful requests, and the type of authority that made the request (i.e. law enforcement, court order).

Yours sincerely,  
Peter Tonoli