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**From:** Jim Stewart <jim@stewartmedia.com.au>  
**Sent:** Thursday, 1 March 2018 8:34 AM  
**To:** auDA Policy Review  
**Subject:** Fwd: PRP Submission.

In addition to below;

The implementation of this will see increased data loss and phishing scams for business. Users will confuse email addresses and companies will find their sensitive data in the wrong hands. Case in point. <https://www.smh.com.au/business/banking-and-finance/nab-sent-customer-data-to-domain-name-squatter-owner-of-adult-websites-20170109-gto8ax.html>

This is very bad for business. If you had a business representative on your panel you would probably know this.

----- Forwarded message -----

From: **Jim Stewart** <jim@stewartmedia.com.au>  
Date: 6 November 2017 at 07:55  
Subject: PRP Submission.  
To: [policy.review@auda.org.au](mailto:policy.review@auda.org.au)  
Cc: Jim Stewart <jim.stewart@stewartmedia.com.au>

Implementation of direct .au registration will cost Australian businesses millions of dollars in lost traffic, asset depreciation and asset protection. It will also damage the .com.au brand possibly irreparably .

The board's stated benefits for implementation of direct AU registrations have no basis in fact or supporting data. They are ridiculous arguments where all the benefits are for Supply members. See my previous video on the matter. <https://stewartmedia.com.au/direct-au-registrations-a-new-australian-internet-tax/>

My company StewArt Media has been helping business online since the late 90s. In the last 16 years we have focused primarily on SEO and more broadly digital marketing. We have worked on thousands of websites and their search rankings.

To rank well in the search engines you cannot have duplication of content. Therefore, if a business decides they wish to rebrand under a direct AU domain they will have to redirect every page of their their existing site to the new equivalent ones at the new domains. Google calls this Change Of Address and has a process around it. (<https://support.google.com/webmasters/answer/83106?hl=en>) If this process is done properly most businesses will lose at least 50% of their traffic from search usually for a period of 9-12 weeks depending on the size of the site and strength of the brand. **That means a 50% loss in leads and sales from search if it is implemented properly.** As most businesses major traffic source is from search, this is a significant loss. We

would normally charge around \$10k over 90 days for most sites. So for me, Direct AU registrations are great for business.

Even pushing a new site live on the same domain can have major issues if not done properly. In 2012 a lot of NRL teams disappeared from Google because new sites were pushed live without proper redirects and understanding of search engines. Here's the email I received from Melbourne storm at the time.

“On 14/03/2012, at 2:33 PM, [XXXXX@melbournestorm.com.au](mailto:XXXXX@melbournestorm.com.au)> wrote:

Hi Mate,

Need your technical advice, all the sites that have been launched so far have lost all their search engine ranking. We don't appear in any searches (can also try the Broncos & St. George). “

If a Change Of Address is not implemented properly the new sites will disappear from search engines altogether until necessary redirects and change of address has been implemented.

Strong brands will have less disruption if the changes are implemented properly, however that is a small percentage of total businesses and it is unlikely that most would implement a Change Of Address Migration properly.

Earlier this year we migrated [stewartmedia.biz](http://stewartmedia.biz) to [stewartmedia.com.au](http://stewartmedia.com.au) . Our main reason for doing so was to strengthen the trust of our brand in search results. Our search traffic dropped by 50% over 8 weeks as Google recrawled our site and reassessed our rankings. This is typical and was expected.

Once the rankings have been restored to the new Direct AU site, a business can still expect lower click through rates in the search engines as lesser known TLDs are seen as less trustworthy.  
( <https://www.semrush.com/blog/new-research-visitors-don-t-trust-alternative-domain-extensions/> )

This in turn will see not only a traffic drop but a subsequent rankings drop as Google detects lower trust in the domain.

Most businesses, if they are smart will register their direct AU and shelve it. This is simply an extra cost for zero benefit, except to supply members.

In summary auda is proposing a change, that will devalue existing com.au assets and if implemented properly by site owners, will see a 50% drop in traffic/revenue and a further drop in click through rates for a unknown period. There are zero benefits. None. Nada. Zilch.

Direct AU registrations are disastrous idea for the AU namespace and should be abandoned as soon as possible. It would be negligent of auda to do otherwise now they are informed. I will be making this submission publicly available and encouraging clients who register a Direct AU and have losses to bring a claim against auda for compensation.

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## Brand Biggest Ranking Factor - Switzer SkyNews

