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**From:** Safe Healthy Happy <safehealthyhappy@bigpond.com>  
**Sent:** Tuesday, 13 March 2018 12:50 PM  
**To:** auDA Policy Review  
**Cc:** senator.fifield@aph.gov.au  
**Subject:** Response to Issues Paper re .AU domain name registration

**Follow Up Flag:** Follow up  
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To AUDA,

I am the registrant for several [.com.au](#) domain names as I am a sole trader - but with three separate websites which highlight the three separate services I offer.

I also am registrant for a [.com.au](#) domain name for a non-profit company (very) recently established (I'm a director) with the intention to register the associated [.org.au](#) domain.

I believe this push to have ".AU" domains is just a way for registrars to increase revenue and apart from usage statistics from around the world (which is misleading - because owners of 2LD and 3LD would have felt forced to register), I have not seen an answer to the question "why do we need .au?".

Who is pushing this and why?

Is it existing businesses/individuals in Australia?

I would like to see the research - please publish.

In my opinion - and certainly in my own situation - this will just increase costs for existing business owners and companies - including non-profit companies.

For what purpose? Who is this change actually benefitting?

Now as well as needing to register the .com and [.com.au](#) - we will have to "defensively" register the .au to prevent other people registering it as per point 39 in the issues paper (which relates to [.net.au](#) but also applies to .com, [.org.au](#) for non-profit companies and will apply to .au).

So here are my thoughts if this horrible policy is implemented:

- 1) Registration of .AU must be restricted as per Model A in PRP-forum-presentation-FINAL.pdf - i.e. there must be a mandated relationship between the registrant and the domain name as per the existing [.com.au](#) rules.
- 2) Priority registration must be implemented for those with [.com.au](#) etc. and should be longer than 6 months - I think it should be 12 months.
- 3) Pricing has not been discussed in the presentation or issues paper - but I think for the period of priority registration there should be a price cap of some kind for .au registrations being performed by

those who qualify for priority registration. This acknowledges that an additional ongoing cost is being imposed for which there is little or no benefit (except to the registrars!).

4) I absolutely concur with this statement in point 74 of the issues paper - *The Australian Communications Consumer Action Network (ACCAN) recently noted that "there is a broad perception within the community that a domain name should closely resemble the organisation that registers them."*<sup>25</sup> *The Panel notes that trust in the .au is because "it does what it says on the box."*

In a world of dramatically increasing use of the internet, online purchasing (with the associated increase in hoaxing/phishing/scamming) etc. it is critical that consumers/users can trust the .AU domain name. This is why I believe Model A is the only sensible way to regulate the .AU if it is going ahead.

5) In Point 86 in the issues paper, the question is asked by the Panel whether such practices as "parking" domains etc. create a barrier to new entrants. I would like to know how making the .AU a less regulated, free-for-all would help that. Surely all it will do is allow domain name reseller businesses open slather and reduce the value of existing domain names.

6) The questions following point 91 of the issues paper "How should interests of those involved in domain monetisation be balanced against the needs of the broader Australian Internet Community?" - again I ask the question - please provide published research regarding "the needs of the broader Australian Internet Community". I still have zero understanding of the benefits of this whole policy.

7) I believe that sub-leasing of domain names by registrants should NOT be permitted. Again for the same reason as noted in point 74 of the issues paper and my point 4 above. It leads to trust in domain names.

8) Point 98 - Where a domain name licence is transferred between registrants, should the transferee receive the benefit of the remainder of the licence period? - Yes, absolutely.

I think there needs to be more consultation and community education on this.

Julie Pianto