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**From:** Keith Bower | Dreamscape Networks <keith.b@dreamscapenetworks.com>  
**Sent:** Friday, 2 March 2018 6:42 PM  
**To:** auDA Policy Review  
**Subject:** Policy Review Submission

To whom it may concern,

Dreamscape Networks as owners and operators of the .AU accredited registrar Web Address Registration Pty Ltd would like to make the following submission after attending the Policy Review Forum in Perth.

Dreamscape, via Web Address Registration is responsible for nearly 1/3 of the .AU domain market and is a trusted and affordable online solutions provider to Australia's Small to Medium size Businesses.

It is clear to use that there is desire from our customers for shorter, easier to communicate domain names, and that this need not be necessarily difficult or costly to implement. We entirely support the introduction of .au domains as it holds great promise for modernising and reinvigorating Australia's domain space.

We suggest that the current proposal of a random or raffle allocation of domain names, that are conflicted if there has been no resolution between the parties, to be not suitable.

There would be several issues on conflicting names where the 'rightful' domain owner would miss out on the .au TLD due to luck. For example, in a dispute between google.net.au & google.com.au if there was no resolution to their private negotiations, the owner of google.net.au may become the registrant for google.au.

It is important to consider that the majority of .au customers currently and small to medium sized businesses. Because of their size, they would be at a disadvantage since they will not be able to compete with bigger entities with larger budgets. Because of this, it is more likely that a commercial agreement would not be reached, in which instance they could lose out in the instance of a raffle.

We propose that the domain name allocations to be always awarded to the longest serving registrant instead of the raffle. Since this 'first in best dressed system' is already operated for TLD registration, giving priority rights to the longest serving registrant would be 'fairest' in this situation.

To align with most of the other TLDs on the market and to be consistent, we also suggest that the registration term for .au should be 1 – 10 years. This would align .au with other TLDs and be the least confusing option for customers.

We don't believe there are any valid reasons to have the maximum term set to 5 years, instead registrants committing for 10 years will give the most commitment to the domain space. There are no downsides to being easy to understand, and giving customers the most options to commit to longer terms. For a SMB, making it easy to plan and budget for the future is essential.

We agree with the new eligibility rules that have been suggested by the panel.

Thank you and please let us know if you would like any clarification to the above.

Regards,

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