

Response to auDA 2007 Names Policy Panel Issues Paper - May 2007

CASE is a non-profit organisation providing information and communication technology support exclusively to community and non-profit organisations. Our comments are primarily focused on the two domain name spaces most commonly used by our members, .org.au and .asn.au.

Should .au be opened up to direct registrations (eg. domainname.au)? If yes, should there be any policy rules, and if so what rules?

We note in sections 7.1 to 7.9 arguments for and against this issue and conclude that **the points against implementing direct registration in the .au domain name space appear to be stronger**. In general terms, our organisation would not support a change in policy to allow direct registrations in the .au domain space.

We also note that other ccTLDs have found the introduction of direct registrations beneficial and do not feel that this issue would have enough impact on our sector to raise serious concerns with the following exception:

CASE does not support point 7.3 option 1 which states that only direct registrations would be allowed. We feel that this model would only serve to exaggerate the negative factors presented and create serious conflicts when current names might have to compete for the direct registration. As an example using our own domain name of 'case.org.au' and the commercial equivalent of 'case.com.au', we would not consider it fair for one of these organisations to lose their known presence on the web by being required to relinquish their domain name simply to allow the use of the direct registration name of 'case.au' by one of the organisations involved.

In the case of direct registrations being introduced with 7.3 option 2, which allows for a combination of direct registrations and 2LDs, we feel that this would be far more useful while at the same time allowing for the benefits of direct registrations to be experienced in the .au domain space. With this option no organisation would be forced to relinquish their domain name. CASE would only support this option if the current policy of '*first come first served*' was retained. We are not referring to who applies for the direct registration first. **We recommend giving the option of the direct registration to the organisation that registered the equivalent conflicting 2LD first.** In other words, the organisation that has held the license of the equivalent 2LD the longest.

*Should the policy rules for **asn.au**, **com.au**, **id.au**, **net.au** and **org.au** be changed? If yes, what changes should be made?*

For this submission we collated a sample of 808 domain names licensed by non-profit and community organisations. The purpose of this exercise was to sample the use of the .au domain name space by our sector. The following chart illustrates the distribution of the sample:

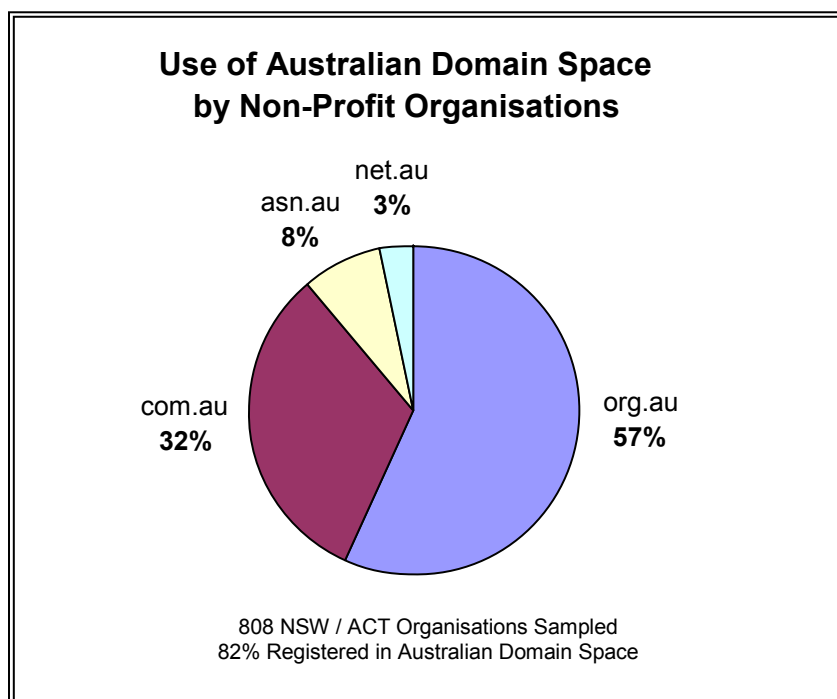


Fig 1

the results clearly indicate two areas of concern for us that may warrant further investigation to determine if changes to current policies would address these issues.

1. Figure 1 indicates an 18% use of non-Australian domain space. Our experience with members has been that they have a very strong preference for their domain names to be in the Australian domain space. We would not have expected this percentage to be so high and feel that it would be worth further research to determine why this choice was made.

We suspect that this number may have been influenced by pre-auDA policies which were implemented by volunteers in exchange for providing the service of registration at no cost. In our experiences these policies were very restrictive and often times led to the use of a non-Australian domain name.

2. Another interesting indicator from the sample is the high percentage of non-profit organisations registering names in the com.au and net.au space. This is clearly outside of both the previous and current domain name registration policies. Again, we feel this issue could benefit from further research to determine what part, if any, policy plays in this anomaly. Furthermore, if these organisations would like to correct this situation we would be interested to see strategies developed to support such an initiative.

Should registrants be allowed to sell their .au domain names?

CASE believes that there is enough evidence from other ccTLDs that allow this practice to indicate that the sale of domain names only leads to domain name harvesting and speculation. Neither of these appear to support the overall goals of auDA or those interested in the principles of equity therefore we do not support the concept of domain name licensees being allowed to sell domain names.

We do support the concept of domain name transfers as a normal organisational requirement. We encourage auDA to modify their policies and/or procedures to support this need in a manner that is less complicated and less expensive than it is now.

Comments and/or questions regarding this submission may be forwarded to the President of CASE, Darrell Burkey - president@case.org.au.