

COMMENTS ON auDA 2012 INDUSTRY ADVISORY PANEL

DRAFT RECOMMENDATIONS - SEPTEMBER 2012

Dear Paul,

Please find below AusRegistry's response to the 2012 Industry Advisory Panel Draft Recommendations – September 2012.

We thank you for this opportunity to respond.

Kind regards,

A handwritten signature in black ink, appearing to read "Adrian Kinderis". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Adrian Kinderis
Chief Executive Officer
AusRegistry Pty Ltd

1.1. Issue 1: The method of 2LD registry operator selection/appointment post-2014

Draft Recommendation 1A:

The Panel recommends that:

a) the competitive registry model should be retained

AusRegistry supports Draft Recommendation 1A to retain a competitive registry model.

b) auDA should initiate renegotiations with AusRegistry to extend contractual arrangements for 2, 3 or 4 years

As the current Registry Operator, AusRegistry respectfully acknowledges the Panel's Draft Recommendation to extend contractual arrangements by way of renegotiation. Should this method form part of the final report and receive auDA Board approval, AusRegistry's participation in renegotiations will be undertaken with the same transparency and willingness to deliver value and quality of service as demonstrated in previous processes.

We view the Panel's Draft Recommendation as a testament to our ongoing performance and confidence in our future commitment. AusRegistry regards the position of Registry Operator as a privilege and is committed to delivering the highest standards of service delivery to ensure a stable and secure environment for the Australian Internet community.

Our submission to the June 2012 Issues Paper outlined AusRegistry's ongoing commitment to the .au domain name, highlighting our contribution to the growth of the namespace which has increased by more than 600% since December 2002. As we approach the end of 2012, our commitment is unwavering. With over 2.5 million domains, the .au namespace is now the 9th largest ccTLD, an achievement worthy of industry commendation.

AusRegistry is a passionate industry participant, contributing to industry panels, workshops, working groups and local and international conferences. We actively support auDA's community engagement activities and invest in valuable industry research for the benefit of our stakeholders and the Australian Internet community.

AusRegistry is deeply committed to our direct channel, the .au Registrars, with whom we interact daily. We continually work to strengthen these relationships through various forms of engagement and constantly seek feedback and suggestions. We also seek to empower Registrars with the development and provision of business related tools to assist in sales related activity.

AusRegistry gratefully acknowledges the support of the .au Accredited Registrars who have endorsed the Panel's Draft Recommendation to enter into renegotiations with AusRegistry to extend contractual arrangements for a four year term.

Support for AusRegistry

By way of summary, the majority of .au Accredited Registrars submitted a formal response to the 2012 Industry Advisory Panel's Draft Recommendations, supporting the Draft Recommendation for auDA to initiate contract negotiations with AusRegistry, with most recommending that contractual arrangements be extended for an additional four-year term (Note: There are currently 39 Accredited Registrars comprising 28 single Registrar entities and 5 Registrar Groups).

This overwhelming support to retain the existing Registry Operator is a strong indication that the current environment in which Registrars operate more than meets expectations. Additionally, in light of such strength of feeling, Registrars have understandably indicated they are not in favour of incurring what they deem to be unnecessary costs associated with changing Registry Operators.

We would also like to acknowledge the support of industry body APTLD (Asia Pacific Top Level Domain). APTLD have posted a submission which recognises the positive industry engagement and continued support and participation of AusRegistry in the Asia Pacific domain name industry. Importantly, the APTLD's submission highlights AusRegistry's dedication towards sharing insights and experience in an effort to help other domain name registries achieve industry best practices.

Finally AusRegistry would like to thank the Internet Society of Australia, ISOC-AU, for providing a letter acknowledging our support and commitment over time. The letter forms an appendix to this document.

c) if renegotiations with AusRegistry fail, auDA should proceed to conduct a formal RFT process; and

d) the auDA Board should publicly commit to undertaking a formal RFT process once the renegotiated registry agreement expires.

As previously stated in our submission to the June 2012 Issues Paper, AusRegistry will participate in whichever process the Panel determines is the most appropriate method of securing the best value for the Australian Internet community. Additionally, AusRegistry will support the auDA Board's decision, should they decide to publicly commit to undertaking a formal RFT process once the renegotiated agreement expires.

1.2. Issue 2: The policy and process for registrar accreditation

Draft Recommendation 2A:

The Panel recommends that auDA should revise the fees for registrar accreditation, to better reflect the direct costs of the accreditation process and ongoing regulation.

As indicated in our submission to the June 2012 Issues Paper, AusRegistry believes the current accreditation fees strike an appropriate balance of attracting suitable service providers, whilst discouraging those not sufficiently equipped to operate in the .au ccTLD. Furthermore, the current accreditation fees are comparable to industry standards and namespaces.

If auDA intends to revise fees for Registrar accreditation to better reflect the direct costs of the accreditation process and ongoing regulation, we would encourage visibility with respect to the nature of these costs.

Draft Recommendation 2B:

The Panel recommends that:

a) current requirements for ASIC and ATO registration for overseas-based registrars should be retained; and

b) overseas-based registrars should be required to bear the reasonable costs of a site visit by an auDA staff member during provisional accreditation.

AusRegistry supports the current requirements for overseas-based Registrars with respect to ASIC and ATO registration. Furthermore, it is a reasonable expectation for Registrars based overseas to bear the costs of a site visit by an auDA staff member during provisional accreditation.

Draft Recommendation 2C:

The Panel recommends that the requirement for applicants for registrar accreditation to act as a reseller of another registrar for 6 months, or show equivalent experience, should be retained.

AusRegistry supports Draft Recommendation 2C to retain the requirement for applicants for Registrar accreditation to act as a reseller of another registrar for 6 months, or show equivalent experience.

Draft Recommendation 2D:

The Panel recommends that the registrar accreditation process and criteria should be the same for all applicants, regardless of their proposed business model.

AusRegistry supports this Draft Recommendation whereby the Registrar accreditation process and criteria should be the same for all applicants, regardless of their proposed business model.

1.3. Issue 3: Registrar security

Draft Recommendation 3:

The Panel recommends that the auDA Board adopt the auDA Information Security Standard (ISS) as a mandatory requirement for accredited registrars, and take appropriate steps to finalise the ISS documentation and processes and ensure its prompt and effective implementation.

AusRegistry played a key role in the development of the draft auDA Information Security Standard (ISS), participating in the Registrar Security Group established by auDA to consider ways of improving

Registrar security. We therefore support the implementation of the ISS as a mandatory requirement for accredited Registrars.

As the incumbent Registry Operator we view this security initiative as a vital addition to support industry best practice. There is a growing requirement to safeguard the industry from increased security threats and the ISS goes a long way towards ensuring Registrars employ robust security policies and processes to protect themselves, their customers and the Internet community from threats and vulnerabilities.

As outlined in our response to the June 2012 Issues Paper, AusRegistry employs strict controls with respects to security. AusRegistry's Domain Name Registry System's architecture is underpinned by a comprehensive set of security policies and our certifications:

- ISO27001:2006 Information Technology - Security Techniques - Information Security Management Systems, and
- ISO9001:2008 Standards for Quality Management system,

reflects the company's commitment to maintaining the highest of security standards.

AusRegistry will work diligently with auDA and Registrars to facilitate the prompt and effective implementation of the ISS should this Draft Recommendation be approved.

1.4. Issue 4: The status and regulation of resellers

Draft Recommendation 4A:

The Panel recommends the retention of the current .au industry model for auDA, registrar and reseller inter-relationships.

AusRegistry supports Draft Recommendation 4A in relation to the retention of the current .au industry model for auDA, Registrar and reseller inter-relationships.

Draft Recommendation 4B:

The Panel recommends that auDA develop a standardised agreement template for registrars to use as a basis for their reseller contracts.

AusRegistry supports Draft Recommendation 4B in relation to the development of a standardised agreement template for Registrars to use as a basis for their reseller contracts.

Draft Recommendation 4C:

The Panel recommends that auDA develop and implement a system for adding a reseller "contact object" to the registry database, including a "reseller contact ID", name and email address, and that auDA should be responsible for managing this mechanism for recording resellers.

AusRegistry supports Draft Recommendation 4C believing the addition of reseller information will provide a greater level of visibility to the Registrant and alleviate confusion within the marketplace.

1.5. Issue 5: The policy and process for registrar transfers

Draft Recommendation 5A:

The Panel recommends that no changes be made to the current .au transfer authorisation process.

AusRegistry supports Draft Recommendation 5A and agrees that no changes be made to the current .au transfer authorisation process.

Draft Recommendation 5B:

The Panel recommends that bulk registrar transfers be allowed with auDA approval in the case of mergers and acquisitions, and that auDA ensure that the process includes appropriate registrant protections.

AusRegistry supports Draft Recommendation 5B believing it will simplify the transition process and lessen the time and effort currently required to process individual transfers.

Draft Recommendation 5C:

The Panel recommends that bulk reseller transfers be allowed with auDA approval, and that auDA ensure that the process includes appropriate registrar and registrant protections.

AusRegistry supports Draft Recommendation 5C believing it will simplify the process and lessen the time and effort currently required to process individual transfers.

1.6. Issue 6: The status and operation of the .au Domain Name Suppliers' Code of Practice

Draft Recommendation 6:

The Panel recommends that auDA assume responsibility for facilitating regular review and updating of the .au Domain Name Suppliers' Code of Practice in consultation with relevant stakeholders.

AusRegistry supports Draft Recommendation 6 which recommends that auDA assume responsibility for facilitating regular review and updating of the .au Domain Name Suppliers' Code of Practice in consultation with relevant stakeholders.

1.7. Appendix: Letter from the Internet Society of Australia, ISOC-AU



Internet Society of Australia A Chapter of the Internet Society

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Mr Adrian Kinderis
Chief Executive Officer
AusRegistry Pty Ltd
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Melbourne, Victoria, Australia. 3004.

18 October 2012

Dear Mr Kinderis,

AusRegistry's support of Internet Society of Australia

I wish to take this opportunity to thank you and AusRegistry for once again supporting the Internet Society of Australia and our work by renewing AusRegistry's Silver level of Sponsorship in 2012 - 13.

Sponsors have supported the Society since it started in 1996 and have been fundamental to its success. Through their support, Internet Society of Australia Sponsors show their firm commitment to the development of the Internet. This provides a direct benefit in return, because Sponsors are organisations for whom efficient Internet services are fundamental to their businesses, products and communications.

AusRegistry's support over many years since at least 2004, including through its membership and sponsorships at varying levels have contributed over \$60,000 in direct funding to the Society's activities and provided many intangible benefits which have been greatly appreciated.

Over the last 12 months the Internet Society of Australia has been very active, including participating in the organisation of the successful IPv6 Summit in Melbourne in November in conjunction with the Australian Industry Group and convening a business round table in advance of the World Conference on International Telecommunications in Sydney in May. In July we ran a business round table in Ballarat with the support of the Ballarat City Council as a prototype of a model to assist regional businesses, educational institutions and community organisations to prepare for the arrival of the NBN.

We have remained active through submissions to government and industry working groups. In the last year we have made submissions to the auDA Industry Advisory Panel, the ALRC Reference Panel on Copyright, to both the Internet Industry Association and DBCDE on the iCode Review, and to the Joint Committee on Intelligence and Security both in writing and more recently appearing before the committee.

We have recently embarked on a strategic review of the Society to help us become a more effective and responsive organisation and you should look forward to some exciting developments in the next few weeks and months.

None of this is possible without the generous support of our members and sponsors.

Regards,



George Fong
Vice-President

The Internet Is For Everyone
<http://www.isoc-au.org.au>