18 October 2012

Mr Paul Szyndler
auDA Industry Advisory Panel
Email: paul.szyndler@auda.org.au

Dear Paul,

Please find attached the .edu.au Domain Administration Committee's response to the draft recommendations released in September 2012. If you have any queries, please do not hesitate to contact me on telephone 03 6231 4091 or by email edac@stenning.com.au.

Yours sincerely

Nick McShane
Executive Officer, eDAC

CC   Paul Stubing
      Chair
      .edu.au Domain Administration Committee

      Jerry Leeson
      eDAC representative on auDA Industry Advisory Panel

Draft Recommendation	eDAC Response
Issue 1. The method of 2LD registry operator selection/appointment post-2014.	
Draft recommendation 1A: a) The competitive industry model should be retained.	eDAC supports this recommendation.
b) auDA should initiate renegotiations with AusRegistry to extend contractual arrangements for 2,3 or 4 years.	eDAC supports this recommendation, accepting that the local industry does not appear to have a sufficiently credentialed competitor at this time and also the level of satisfaction that the incumbent provides in terms of price and performance.
c) if renegotiations with AusRegistry fail, auDA should proceed to conduct a formal RFT process	eDAC supports this recommendation.
d) the auDA Board should publicly commit to undertaking a formal RFT process once the renegotiated registry agreement expires.	eDAC supports this recommendation.
Draft recommendation 1B: The panel recommends that auDA should retain the current single registry for existing .au 2lds, while allowing the option for the introduction of multiple registries in the future.	eDAC supports this recommendation, noting that any introduction of multiple registries must ensure that all second level domains (2LDs) are catered for, including closed domains such as gov.au, edu.au and csiro.au. Existing 2LDs should not be disadvantaged by the introduction of multiple registries.
Issue 2. The policy and process for registrar accreditation.	eDAC notes that this issue pertains to accreditation of registrars. auDA has previously drawn a distinction between accredited and authorised registrars. Through an agreement with auDA, the Registrar for the edu.au 2LD is an authorised registrar. There are no recommendations concerning this issue that have been identified as relating to authorised registrars. As a consequence, eDAC does not have a view on the recommendations for this issue.

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Issue 3. Registrar security.	
<u>Draft Recommendation 3</u>: 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.	The operation of the edu.au 2LD is supported through the infrastructure provided by an accredited registrar. eDAC notes the strong support for the proposed Information Security Standard (ISS) and supports the recommendation that all Registrars meet this standard.
Issue 4: The status and regulation of resellers.	The status and regulation of resellers Is not an issue for the edu.au 2LD. eDAC does note that Draft Recommendation 4c, in response to more formal recognition of resellers, proposes changes to the WHOIS function. eDAC has registered its concern (through its representation on the auDA Industry Advisory Panel) that current WHOIS practice (at the registration zone level) is creating inefficiencies in the edu.au 2LD and proposes a review into this area. eDAC understands there are wider concerns within the industry regarding information provided via WHOIS. eDAC would be pleased to participate in a review of the WHOIS functionality for .au.
Issue 5: The policy and process for registrar transfers	The edu.au 2LD uses a single registrar and is not affected by this policy, or the draft recommendations. eDAC has no view on recommendations for Issue 5.
Issue 6. The status and operation of the .au Domain Name Suppliers Code of Practice.	
<u>Draft Recommendation 6</u>: 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.	In so far as it pertains to the operations of the edu.au 2LD, the edu.au registrar strives to meet the .au Domain Name Suppliers' Code of Practice. eDAC notes the challenges in maintaining the Code of Practice under the current arrangement and supports the Draft Recommendation that auDA assume responsibility for facilitating regular review and update of it. eDAC notes that there are aspects of the code (eg renewals) that may be in need of review. While the edu.au 2LD can to an extent, implement its own policy, it is preferable to adhere to best practice from other .au 2LDs wherever possible. Doing so has a number of benefits for edu.au and its registrants. Consequently, eDAC would be pleased to participate in a review of the Code of Practice should the Draft Recommendation be implemented.

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