



The Honourable Kevin Anderson MP
Minister for Better Regulation and Innovation

Our reference: 01470-2019

Mr Cameron Boardman
.au Domain Administration LTD
By email: alister.paterson@auda.org.au

Dear Mr Boardman

Thank you for your correspondence about policy changes to the Australian domain name system.

The NSW Government strongly supports initiatives that reduce red tape and barriers for Australian businesses. I note that the opening up of domain registrations at the second level and the reduced allocation rules for .au registration will make it easier for small and emerging businesses to gain an online presence.

However, I am concerned that the transition to .au may be costly to businesses. The 'first come, first serve' policy risks customer confusion and loss of brand credibility and identity for businesses. Businesses should be supported in the transition through clear policies and procedures to be followed which focus on the prevention of loss of business and customer confusion. For example, businesses may feel it necessary to reserve a comparable second level domain name to prevent competitors or other businesses registering similar domain names. In developing eligibility and allocation rules, you may wish to consider a rule which prevents duplication of name spaces between .com.au and .au (for example, Telstra.com.au and Telstra.au cannot be registered by different businesses, even where Telstra.com.au have declined to transition to .au during the priority allocation period). The eligibility and allocation rules should be clearly outlined and communicated publicly.

It is also very important in opening second level domain names to .au that State Government departments are able to maintain brand recognition and a consistent online presence. The preservation of government geographic domain names is necessary to maintain the Federal and State Government divide. In this regard I note that the auDA Board Policy Review Panel has recommended reserving certain controlled names for future use at second level domain name spaces. However, I encourage the broadening of names to include more government departments. For example, reserving fairtrading.au to allow for nsw.fairtrading.au and qld.fairtrading.au. The transition to second level domain names for government departments needs to ensure minimal disruption for customers of NSW who source services or information online.

Thank you for the opportunity to provide feedback on the proposed changes.

Yours sincerely

Kevin Anderson MP
Minister for Better Regulation and Innovation

Date: 01/07/19