

Dear Policy Review Panel,

Firstly I would like to commend you on the herculean task of reviewing, simplifying and consolidating the current auDA policies into three policies. While also making recommendations on how to introduce direct registration. I feel you have been open with your consultation process and have been responsive to input.

However your most recent request for public comment contains an alarming departure from reviewing, simplifying and consolidating existing policies to an active attempt to disrupt the Domain Investor community. Sections 3.3 and 3.5 specifically are calling for radical changes that are alarming and will cause a huge disruption to the industry.

I note that you are very clear in section 1.2 about giving the auDA Board leeway to consider your recommendations in relation to domain monetisation (section 3.5) in isolation from the package of policies you are recommending.

I strongly feel that you should also grant to the auDA Board the same leeway to consider section 3.3 (Resale and warehousing) in isolation of the package of policies.

On a purely practical level the cost-benefit of direct registrations analysis done by ACIL Allen Consulting does not factor in the implications of Sections 3.3 and 3.5. to my mind you would need to redo these calculations if you are to recommend the board to consider Section 3.3 as part and parcel of the Direct Registration package of recommendations. The OmniPoll research makes strong reference to .au as being similar to [.net.au](https://www.net.au) and being highly likely to be chosen if a [com.au](https://www.com.au) is taken. Once again if warehousing is as big a problem as your recommendations claim it to be, if you remove all of these domains from current domain owners, and make them available then the need for direct registrations is diminished, so you would be altering the status quo significantly and your polling research would need to factor this in, making all the prior research and poll numbers no longer indicative and thus can not be used to recommend direct registrations.

I strongly believe that Section 3.3 and Section 3.5 warrant a future review as the implications are substantial or at the very least leave this decision open for the auDA board to determine.

I would be happy to join a future Review Panel on these subjects rather than attempt to provide a 10 page discussion paper on each part and point that you would need to read and absorb while you are supposed to be actively engaged in attempting to find the most equitable way to introduce direct registration.