

From: Broker.com.au [REDACTED]

Sent: Monday, 11 March 2019 1:03:52 AM

To: auDA Policy Review

Subject: RESPONSE - Focus groups on reform of existing auDA policies & implementation of direct registration

Attention: 2017 Policy Review Panel (PRP)

From: Louise Sandberg CEO, Broker.com.au

Dear Sir/Madam,

In response to the PRP's request for feedback regarding the "Focus groups on reform of existing auDA policies & implementation of direct registration", I would like to submit the following two key items of consideration.

Item 1 - Parties profiting from other brands unfairly

My firm has spent considerable time and resources acquiring the premium domain name broker.com.au, including substantial time and resources in the subsequent development of this brand.

If auDA is to introduce the .au domain prefix, which will result in the possibility of another 3rd party operating a domain name that would be deceptively similar to our own (i.e. Broker.au). Then there is a high likelihood of this 3rd party, that has made no commitment or investment in the "broker" band, being able to leverage off of our own goodwill, brand and marketing.

We feel that the probability of this occurring is high and the subsequent cost to Australian businesses significant and we would therefore suggest caution on the part of auDA in these proposals.

Item 2 - Introducing .au will weaken the overall Australian domain space

auDA is a body focused on the development of the domestic web address for Australia. I would like to put forward that to date auDA has been very successful with the .com.au address, which is by far the dominate domain name used in Australia for businesses both big

and small.

I have seen first hand in the United Kingdom and New Zealand the confusion caused by the introduction of additional domestic internet addresses. Anecdotally this appears to have resulted in a number of businesses simply adopting .com as their primary address in these countries, as a means of rising above the confusion caused with operating multiple country level domain types.

The last thing the Australian internet space needs is for businesses to ignore their Australian web address and instead adopt .com as their branding in Australia. Introducing .au as another potential address and the confusion it would create with all stakeholders runs the risk of tarnishing both the .com.au and .au space alike. These new proposals run a real risk of detracting from the overall Australian domain space and at the same time significantly benefiting the .com address in this country.

If you have any additional questions or would like to discuss any of these matters further I can be reached on the enclosed email address or via telephone 1300 658 420.

Regards,

Louise Sandberg, CEO
Broker.com.au