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Electronic Frontiers
AUSTRALIA

Dr Jenny Ng
Executive Board Member

30 Sept 2015.

Dear Ms Jo Lim

Response to the 2015 Names Policy Draft Recommendations

Thank you for the opportunity to address the 2015 Names Policy Draft Recommendations. I make this submission in my personal capacity. Hence, these views are my own views, and are not necessarily the views of the organisations or institutions that I belong to.

2015 Names Policy Draft Recommendations

The question on opening up to direct registrations seems to receive much support in the survey, and hence, the recommendation to open up to direct registrations should be supported. It is understandable if there are some qualified responses in the survey as there may be concerns of abusive registrations or defensive registrations. Whether opening up to direct registrations would result in abusive registrations or defensive registrations would depend on how the system of registration is implemented.

Hence, the implementation should be done in a manner which deals with issues of abusive registrations or defensive registrations.

Furthermore, while the arbitration system currently works efficiently, there may be a need to look into improvements if more registrations under direct registrations would result in a heavier burden on the arbitration system.

I support the policy draft recommendations as they are made in response to the majority opinion in the survey and/ or Issues Paper. The rationalisations for the recommendations are also sound.

Summary position on individual recommendations

DRAFT RECOMMENDATION 1A

I support that .au should be opened up to direct registrations. However, proper safeguards should apply to minimise issues such as abusive registrations.

DRAFT RECOMMENDATION 1B

If .au is opened up to direct registrations, the same policy rules which currently apply to the existing 2LDs should also apply.

DRAFT RECOMMENDATION 2A

I support the recommendation that the eligibility and allocation criteria for open 2LDs be retained in their current form (subject to draft recommendations 2B and 2C).

DRAFT RECOMMENDATION 2B

I support that the fixed 2 year licence period be changed to a variable 1-5 year period.

DRAFT RECOMMENDATION 2C

I support the recommendation that auDA and/or AusRegistry should make the appropriate changes to the policy and/or registry database fields to reflect the nationalised business names registration system, ensuring that there is no disadvantage to registrants.

DRAFT RECOMMENDATION 3A

I support the retention of the Reserved List Policy in its current form.

DRAFT RECOMMENDATION 3B

I support the retention of the Prohibition on Misspellings Policy.

Thank you, and I hope my comments were helpful. Please feel free to contact me if you have any enquiries.

Kind Regards

Dr Jenny Ng

Lecturer (Charles Darwin University) & Executive Board Member (Electronic Frontiers Australia).