

Orthodox Churches Property

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Public Submission
on the Draft Recommendations
of the Name Policy Review Panel
decided at its meeting of 7th September 2004

Submitted by: Orthodox Churches Property Incorporated
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This submission relates to the Glossary and to Recommendation 6: Eligibility criteria for org.au and asn.au

We suggest that internet users in Australia generally have considerable faith in org.au domains

We suggest that internet users generally do not feel quite as comfortable with asn.au names

We suggest it is because of these sentiments by internet users that registrants generally prefer org.au over asn.au

This consumer sentiment needs to be understood before any decision is made to relax the restrictions on org.au

We suggest that it is because of its restrictedness that internet users are generally comfortable with registrants in the org.au 2ld

We suggest that if those restrictions are removed then user faith in the org.au 2ld will be eroded

Verification against official government databases in the registration process gives internet users their faith in org.au as against asn.au

To relax the restrictions on org.au to align them with asn.au will not necessarily increase sales of either org.au or asn.au domains

A better approach would be to address the very real problems so many incorporated associations have in registering under org.au or asn.au and so many unincorporated associations have in registering at all

Orthodox Churches Property Incorporated

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Current registration procedures for org.au require either an ACN or an ABN

ACNs are for companies registered under the Companies Laws. Incorporated Associations are registered under the Associations Laws. By law they cannot obtain an ACN

ABNs are for entities which must be registered for GST or who choose to be registered for GST. Very many Incorporated Associations do not register for GST because their annual turnover is below the statutory threshold and because the compliance cost is greater than any refund they may be entitled to as a charitable or not-for-profit entity

All Incorporated Associations in Australia are allocated a unique INCN (*INC*orporation Number). For instance the INCN for Orthodox Churches Property Incorporated is INC9874478. It can be viewed online by anyone through the Australian National Names Index maintained by ASIC

The other problem with the proposed eligibility criteria (Attachment A of the Draft recommendations) is that no provision is made for the hundreds of thousands of unincorporated not-for-profit organisations in Australia

They more properly belong in a group separate from government registered groups

Unincorporated not-for-profit organisations should be able to obtain asn.au domains but not org.au domains unless they have an ABN

In other words, the distinction between org.au and asn.au should remain.

We recommend that

- 1 the Glossary be amended to include *INCN Incorporated Association Number*
- 2 registration procedures be altered to allow applicants for org.au and for asn.au to provide their INCN in lieu of an ACN or an ABN
- 3 eligibility requirements for org.au not be relaxed in any other way
- 4 unincorporated associations be granted eligibility for asn.au domains
- 5 the eligibility criteria for org.au and asn.au be reviewed in three years after the market indicates its response to the changed eligibility by INCN in both domains, and for unincorporated associations in asn.au

by direction of the Governors

Orthodox Churches Property Incorporated