

## **IntaServe Groups comments on Issues Paper- June 2012**

### Comments on Issue 2.1 (Current accreditation fees and processes)

Increase in application fees might be an option but not the annual fee as all registrars do not process 100s of domains on a daily basis. Maybe have different tiers for annual fees depending on the number of domains under management.

### Comments on Issue 2.2 (Accreditation of overseas based registrar)

All registrars local or international need to go through the same process for accreditation. Also training in regards to au policy is essential.

There have been instances where an international registrar (we do not wish to name the registrar) has had domains locked and email addresses masked, which does not comply with .au policy.

### Comments on Issue 2.3 (Accreditation of registrars for drop catching purpose)

Drop catching service we are still a bit sceptical. We think registrars who wish to provide this service pay an annual fee towards it or have their systems scrutinise regularly to make sure they meet .au requirement.

Also the group who have been pushing for this are the domainers (not that we have anything against them). They do contribute to domain registrations.

### Comments on Issue 2.4 ( Requirement for potential registrars to act as resellers for 6 months or show equivalent experience)

It does not mean that if an entity has acted as a reseller or shows 6 months of relevant experience, they have a good understanding of the au space and policies.

It is essential that training of policies and procedures be a part of the accreditation process.

### Comments on issue 4.2

Not all resellers buy domains for customers. Some resellers can be domainers. So it is very important to re-define "What a certified Reseller is?" Are domainer's certified resellers?

A selection criteria & process will have to be in place with an application fee and annual fee.

### Comments on Issue 4.3

From a registrar perspective it does not really matter with resellers having a listing on WhoIs or getting education or training from auDA, but we definitely do not support any access to the registry.

Again only a certified reseller should be listed on WhoIS.

### Comments on Issue 5.1

The policy & process for registrar transfers is fine. We do not think it needs to be changed at this stage. Again its domainers who want the process modified so that every time they get better deal with a registrar the process of transferring is not time consuming.

Why not completely change the process of transferring .au domains by having "Tags" similar to .uk domains.

Note: We do not have anything against domainers and we just think some of the request for change in policies is for their convenience.

### Comments on Issue 5.2 (Bulk Domains Transfers between registrars, specifically upon acquisition)

As long as the losing registrar notifies domain registrants of the change in registrar of record (due to acquisition) we do not see any harm. Also the registrant will have the option to choose a registrar of their choice, if they do not wish to transfer to the acquiring registrar.

We do not support a charge similar to that of gTLD domains at this stage with bulk transfer over 50,000 domains.

Comments on Issue 5.3

No comments at this stage.