



Hosting + Domains + Anti-virus

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Dear Sir / Madam

Thank you for affording us this opportunity to provide input on the future evolution of .au policy.

Blacknight is an Irish based domain name registrar and hosting provider. We have clients in over 130 countries worldwide, including Australia. Our clients range from individuals to small business to Fortune 500 companies. As a domain name registrar we are directly accredited with many ccTLD domain name registries. We have a deep commitment and many years of experience both in the business of providing domains and hosting to business, as well as in the policy development processes of both ccTLDs and gTLDs.

Our comments are based on the information that auDA has published in recent weeks and are split into two parts:

1. Direct registrations under .au
2. Other proposed changes to .au registration policies

First off we commend auDA on its ongoing engagement with the internet community. In order for a domain name registry to truly serve its community getting feedback and input from stakeholders is crucial.

Direct Registrations in .au

We welcome this proposed change. Many other ccTLDs have been offering direct registrations for many years or have started offering them recently. It also makes sense to give existing registrants of .com.au domain names prior rights. Providing a reasonable period for holders of "prior rights" makes sense and is pragmatic, as long as steps are taken to inform existing registrants of these rights. The channel is probably best placed to assist with this communication. The current proposal however does not deal very gracefully with clashes of rights ie. where there are registrants in two or more SLDs competing for the same string directly under .au. It might make more sense to give .com.au priority over other extensions, as was done in co.uk, for example.

Other Proposed Changes to .au Registration Policies



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We have serious concerns with many of the other proposed changes. They would introduce restrictions on .au registrations that would adversely impact international businesses doing business in the Australian market. Other aspects of the proposals are clearly designed to attack the domain name investment and aftermarket business models. We feel that none of these changes are truly warranted. The Internet and technology has grown over the past 25 years through permission less innovation. What the current proposals risk doing is to impose unnecessary rules that would fetter innovation in the .au namespace, which in turn could have a chilling effect. While other ccTLD namespaces are removing restrictions it is decidedly odd that .au would look to reverse that trend.

Regards

Mr. Michele Neylon, CEO, Blacknight