



17 October 2019

Policy Review Consultation
AuDA
1 Spring Street
Melbourne Vic 3000

Hi there,

Re .AU Namespace Policy Consultation – Proposed Prioritisation

I refer to the above consultation process now underway.

My recommendation relates to the priority status under which .au will be granted; and the proposal to refer to the original '*creation date*' to determine who has the greatest entitlement to .au.

In my view, the creation date approach fails to consider the difference between an entity that has an active, everyday web presence; and an entity that has simply warehoused a similar domain name.

To illustrate my point, someone who has for many years warehoused the domain name www.example.com.au without an internet or web presence, will have greater entitlement to .au over a later entrant who has had a longer, active internet presence using a similar variant such as www.example.org.au or www.example.net.au.

To think about the above example differently, consider a scenario where two variants have been separately registered on the same day. One has been warehoused and remains inactive; the other has had a web presence. Shouldn't the latter have greater entitlement?

I believe that in a case where domain names have been warehoused and remain inactive, the entitlement for a .au domain name should firstly go to the entity with the longest web presence. If this is too difficult to administer, then perhaps at least have a review or appeal process.

Thank you for this opportunity to contribute to this important consultation process.

Best wishes and regards,

Charles Reis