



Australian Government



Australian
**Small Business and
Family Enterprise**
Ombudsman

6 August 2021

.au Domain Administration Ltd
Strategy Consultation
PO Box 18315
Melbourne VIC 3001

via email: consultation@auda.org.au

Dear Sir/Madam

auDA 2021-25 Proposed Strategy

We welcome the suggested .au Domain Administration (.auDA) 2021-25 proposed strategy but recommend greater emphasis on stakeholder consultation when developing policies that impact small and family business' usage of vital public and economic resources. If .auDA is to perform as a quasi-regulator to undertake operation of the .au domain, they must adequately understand the commercial impact of their actions. Failure to do so will inhibit trust in the .auDA, leading to missed economic opportunities and loss of confidence in the organisation.

We also note the Federal Government's Digital Economy Strategy, and that websites are a critical component in driving small business digital engagement and provide the following recommendations:

1. We support wider multi-stakeholder consultations and recommend strategic research regarding the impact that domain names have on small and family businesses so that .auDA can better understand the real-life commercial impacts of their policies. Such research would assist .auDA to identify additional avenues of recourse for customers whose complaint or dispute may fall with .auDA themselves due to actions they have taken to cancel a small and family businesses website.
2. Under the multi-stakeholder and people objectives, .auDA should consider the implications and impact on small and family business to monitor, consider alternative URLs and respond to all potential domain name infringement prospects.
3. .auDA should consider utilising the business names register to better determine 'legitimate entitlement' to a domain name URL. Doing so would alleviate the burden on small and family businesses by automatically identifying that the business meets the Australian presence requirement, the length of time the business has been operating, and the status of the business.

Thank you for the opportunity to comment. If you would like to discuss this matter further, please contact Mr Paul Buckingham on 02 6243 7821 or at paul.buckingham@asbfeo.gov.au.

Yours sincerely

The Hon. Bruce Billson
Australian Small Business and Family Enterprise Ombudsman

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