

Good afternoon,

Please find below our submission as part of the .au Licensing Rules Review (2025) consultation with a request for anonymity when publishing to your website.

Thank you for the opportunity to review and provide feedback on the .au Licensing Rules review 2025. With regards to Issue 1 and consideration of the eligibility requirements, we are of the view that the 'exact match' definition as it currently operates in practice may contribute to domain name squatting and Register cluttering through reliance on Australia trade marks for domain name eligibility outside of its intended application.

The definition of 'exact match' excludes punctuation marks, which has resulted in the application of trade marks featuring established brands interspersed by random punctuation marks. This is arguably not within the spirit of the Licensing Rules, with the trade mark having distinct differences to the intended domain.

While we understand the need to allow for a genuine use of punctuation, we suggest that this could be paired with a requirement that the trade mark retains the same impression as the domain name applied for, or another requirement to that effect. The intention being of removing the unintended consequence of punctuation exceptions being used to circumvent eligibility requirements.

Kind regards,