

Date: 19 March 2026

Re: .au Licensing Rules Review 2025

Issue 1

The following relates to issue 1 of the Issues Paper, “Allocation rules for the com.au and net.au namespaces”.

The only requirements for registration of com.au and net.au domains names should be an active commercial entity (using the current definition) and an Australian presence. Regarding “Part 2 – Licences” of the existing licensing rules for au, section 2.4.4 “com.au and net.au Namespace”, the entirety of 2.4.4(2) should be removed.

Issue 2

The following relates to issue 2 of the Issues Paper, “Domain name monetisation in the com.au and net.au namespaces”.

Domain monetisation should continue to be allowed for com.au and net.au domain names. In addition, although not strictly part of this issue, there should be no requirement to have any website presence on the domain name. The use of a domain name for email services only should be considered sufficient if any form of usage requirements were ever considered.

Issue 3

The following relates to issue 3 of the Issues Paper, “Contested .au Direct domain names”.

Regarding existing contested .au domain names, I see no change necessary to the current process other than auDA continuing to ensure they validate the eligibility criteria that was supplied when the contested domain name was first submitted. i.e. if an ABN was used as the eligibility criteria when a .au was first submitted, and the ABN is no longer active, auDA should cancel the application and award the domain name to the last remaining valid entity. If more than one still exists, it should continue to be contested and not awarded to an entity.

Issue 4

The following relates to issue 4 of the Issues Paper, “Fraudulent and bad faith registrations and reserved names”.

I see no need to change the existing policy that is in effect. Restricting the registration of some domain names on the reserved list should be a practice that is continued.

Issue 5

I have no comment on issue 5 of the Issues Paper, “Complaint process for domain name audits”.

Issue 6

The following relates to issue 6 of the Issues Paper, “Alignment of selected rules in .au with equivalent rules in generic top-level domains (gTLDs)”.

I agree with aligning the renewal window of .au domain names with gTLDs.

I agree with increasing the cooling off period to 5 days. However, the 10% refund limit on registrars should not impact an individual who has registered a single domain name and requests the deletion and refund of a newly registered domain name. The intent of this restriction is to prevent “domain tasting”, or bulk registration followed by bulk deletion, by a registrar on behalf of a registrant. In the case of a legitimate person requesting the deletion of a single domain name, that should not be impacted by a registrar's 10% refund restriction.

There should be no change to the existing client delete period (3 days followed by 14 days).

I agree with aligning the pending delete period with gTLDs, i.e. 5 days.

Additional information

Whilst not listed in the Issues Paper, regarding “Part 3 – Complaints” of the existing licensing rules for au, anonymous complaints should not be allowed. Many individuals hide behind anonymous, vexatious complaints, with the sole intention of obtaining a domain name that they currently do not license. There is no mechanism to prevent a complainant from continuing to submit anonymous complaints on domain names, which ultimately costs registrars, auDA and registrants, significant amounts of time defending these complaints. Simplifying the requirements to licence com.au and net.au domain names would also make it far simpler to establish alignment with registration requirements (entity and presence).