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Sent: Wednesday, April 22, 2026 8:00 PM
To: Strategy Consultation <consultation@auda.org.au>
Subject: [EXTERNAL] - Submission on proposed changes to Schedule A of the .au Licensing Rules (edu.au)

Thank you for the opportunity to comment on the proposed administrative changes to Schedule A of the .au Domain Administration Rules: Licensing.

I am making this submission in a personal capacity. I work across public-interest digital systems, digital trust, and governance, with a particular focus on trust-relevant signals in the .au namespace.

Overall, I support the proposed changes. They are sensible administrative updates and, in general, improve clarity and contemporary fit. At the same time, edu.au is not an ordinary namespace. It carries a legitimacy function: for students, parents, educators, providers, and the broader public, an edu.au domain is part of how authenticity and institutional credibility are inferred.

For that reason, even administrative changes should be handled with a clear bias toward preserving signal quality and avoiding ambiguity in application.

I support the proposed changes in the following areas:

- Updating the definition of entities delivering non-accredited training to reflect current delivery models such as micro-credentials.
- Clarifying the definition of Eligible Referee, particularly by making conflicts and related-entity issues more explicit.
- Adding a definition of “Value Judgement” to improve interpretive clarity.
- Expanding “National Interests and Responsibilities” to better reflect Commonwealth-level registration or accreditation.
- Providing a narrow exemption for a small number of longstanding legacy names that were registered in good faith under earlier rules, while keeping those names non-transferable.

These are, in principle, reasonable and proportionate changes.

However, I think two areas require stronger clarification if auDA wants these amendments to improve administration without weakening confidence in the namespace.

1. Treatment of geographic terms

The treatment of geographic terms should be accompanied by published guidance and practical examples. I understand the policy rationale: preventing applicants from securing broad geographic terms that may confer an unfair or misleading advantage.

However, geographic descriptors can also form part of a genuine and well-understood institutional identity. Without practical guidance, there is a risk of inconsistent interpretation or unnecessary uncertainty for applicants and registrar.

2. Legacy-name exemption as genuinely exceptional

The legacy-name exemption should be framed and communicated as genuinely exceptional. I support the intent to avoid retrospectively penalising a small number of longstanding names that were licensed in good faith under earlier rules.

However, this should be presented very clearly as a contained administrative accommodation, not as a softening of the namespace's present-day integrity settings. The explanatory material should leave no room for misunderstanding on that point, including for current and prospective licensees.

More broadly, I encourage auDA to continue treating edu.au as a trust-bearing public asset rather than simply an administrative category. The value of the namespace depends not only on who is technically eligible, but on whether the rules remain understandable, defensible, and consistently applied. That is what sustains trust in practice.

On that basis, I support the proposed changes, subject to:

- clearer implementation guidance on geographic terms, including examples; and
- a stronger public statement about the narrow and exceptional nature of the legacy-name exemption.

Thank you for considering this submission.

Regards

Bryan