From: DBR
To: LRreview
Cc: admin@assets.com.au
Subject: [EXTERNAL] - Submission — .au Licensing Rules Review Draft Report (Phase 2) — Robert Kaay - DBR.com.au
Date: Wednesday, 8 July 2026 11:55:55 PM

Dear Policy Advisory Panel,

I am writing to provide feedback on the Draft Report for the 2025–2026 .au Licensing Rules Review.

About me:
I am an Australian domain registrant and investor. I hold thousands of .com.au / .net.au / .au domain names as an entrepreneur and business builder, acquired and renewed under rules that have permitted legitimate monetisation, resale, and holding for future use for more than 25 years.

My position:

I support Recommendation 1 — domain monetisation should remain permitted in com.au, net.au, and .au direct.

I strongly oppose the allocation reform options in Recommendation 2, particularly:

- Option 3 — deletion of Rule 2.4.4(2)(f)
- Option 2 — narrowing the "Services" definition or adding administrative burdens on monetised sites
- Option 1 — increased compliance checks that treat ordinary portfolio holding and PPC monetisation as suspect

Rule 2.4.4(2)(f) is the practical pathway that allows Australian businesses to hold descriptive, generic, and keyword domains for services they provide — including advertising and domain-related commercial activity recognised under WIPO Nice Class 35. Removing or restricting it would make hundreds of thousands of existing holdings non-compliant and would devastate the legitimate aftermarket, parking, and drop-catching ecosystem that registrars, brokers, and investors have operated within for decades.

Why this matters:

- auDA's own data shows [582,895 / a large share of] domains are held by registrants with 50+ names
- Monetised and minimally developed domains are a long-standing, registrar-supported part of .au commerce

- Restricting allocation does not stop scammers — it penalises legitimate Australian businesses and investors
- Reduced liquidity and compliance uncertainty will lower domain values, renewal rates, and namespace growth

What I ask the Panel to recommend:

1. Retain Rule 2.4.4(2)(f) in full — do not delete or narrow it
2. Do not introduce new allocation barriers aimed at monetised or portfolio-held domains
3. Keep eligibility focused on Australian presence and good standing, with exact-match protection for trade mark holders
4. Address genuine DNS abuse through targeted enforcement — not broad restrictions on domain investing

Domain investors have contributed to .au growth, liquidity, and renewal revenue for decades. Policy changes that retrospectively undermine that activity are disproportionate, economically harmful, and inconsistent with the flexibility that built the namespace.

Thank you for considering this submission. I am happy for it to be published.

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Portfolio size: around 2000

Publish submission: Yes

Yours sincerely,

Robert Kaay

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