

**From:** [REDACTED]  
**To:** [LRreview](#)  
**Subject:** [EXTERNAL] - auDA Licensing Rules Review 2025  
**Date:** Monday, 8 June 2026 7:59:30 PM

---

Hi auDA Licensing Review Panel

Here is my response & recommendations to the current auDA Licensing Rules Review.

I have been in the online business, marketing & domain investing space for the past 30 years.

I currently own & manage my digital marketing agency Online Impact [OnlineImpact.com.au](#) which I started 23 years ago & I am also the Senior Domain Broker at DBR Digital Assets [DBR.com.au](#) plus dozens of smaller & startup business.

I was also a member of auDA's 2018 DIWG (Domain Investor Working Group), assisting on the auDA Policy Review Panel to finalise its recommendations regarding the policy for the implementation of Direct .AU Registration in Australia.

### **Domain Investors Are Not The Problem**

A healthy secondary market is a sign of a healthy namespace.

Domain investors perform a similar role to property developers and landholders. They identify valuable digital real estate early, assume financial risk, pay ongoing renewal fees, and create liquidity within the market.

Without a secondary market:

- Many premium names would remain unavailable through normal registration anyway.
- Businesses would have fewer opportunities to acquire high-quality domains when they need them.
- The overall value and prestige of the .au namespace would decline.

The focus should not be on restricting legitimate investors, but on preventing bad-faith registrations, cybersquatting and abuse.

### **Eligibility Rules Should Be Modernised**

Current allocation rules often struggle to accommodate:

- Start-ups
- New brands
- Future business concepts
- Investment holding companies
- Intellectual property holding entities

Many businesses acquire domains before launching products, services or trademarks.

The rules should recognise legitimate forward planning and investment activity rather than requiring an overly narrow interpretation of "close and substantial connection."

Australia's digital economy has evolved dramatically since many of these policies were originally developed.

### **Recognise Domains As Digital Assets**

Premium domain names have become recognised business assets.

A domain can:

- Be purchased
- Be sold
- Be licensed
- Be pledged as collateral
- Appear on balance sheets
- Form part of mergers and acquisitions

The licensing framework should acknowledge that domains are now a mature asset class rather than merely technical identifiers.

### **Do Not Introduce Rules That Reduce Liquidity**

Any proposal that makes transfers more difficult, increases uncertainty, or restricts legitimate ownership structures risks:

- Lowering investment in .au
- Reducing aftermarket activity
- Decreasing the attractiveness of .au compared with .com
- Driving Australian businesses toward alternative extensions

The objective should be increasing confidence and transparency, not restricting ownership.

### **Preserve Existing Property Rights**

Registrants who acquired domains under previous rules should not face:

- Retrospective eligibility reviews
- New ownership restrictions
- Forced divestment requirements
- Reduced transfer rights

Policy changes should apply prospectively, not retrospectively.

Stability is critical to maintaining confidence in the namespace.

### **Improve Transparency Around Contested Domains**

Where disputes arise regarding eligibility or competing claims:

- Processes should be clear
- Decisions should be published in an anonymised form
- Consistent precedents should be established

This would improve certainty for registrants, brokers, investors and businesses alike.

### **Encourage Australian Digital Investment**

The .au namespace benefits when participants invest capital into acquiring and developing quality domains.

Rather than viewing investors as a risk category, auDA should recognise that responsible investors:

- Increase market liquidity
- Help domains find end users
- Support price discovery
- Promote awareness of .au domains
- Strengthen Australia's digital asset ecosystem

### **My Key Recommendation**

The review should focus on:

Preventing fraud

Preventing cybersquatting

Preventing bad-faith registrations

Improving transparency

Simplifying eligibility requirements

Supporting legitimate transfers and acquisitions

Not on:

Restricting legitimate domain investment

Limiting secondary market activity

Creating uncertainty around ownership rights

Introducing retrospective compliance burdens

Australia benefits from a strong, liquid and trusted .au domain market. Any reforms should strengthen that market, not weaken it. The goal should be to encourage investment, innovation and business growth while maintaining appropriate safeguards against abuse.

As someone working daily in the Australian domain acquisition and brokerage market, I'd also argue that premium .au domains help Australian businesses compete globally. Policies should recognise that a thriving aftermarket is not a loophole in the system, it is one of the reasons the namespace has value in the first place.

Thanks for your time on this critical matter for the Australian Domain Space.

Kind regards

Ed Keay-Smith

Online Impact  
PO Box 755,  
South Perth WA 6951



Email: 

Web: [www.onlineimpact.com.au](http://www.onlineimpact.com.au)

Contact Me  [LinkedIn](#) [Twitter](#)