

.au Licensing Rules Review November 2025

Submission from Locksmith Nominees Pty Ltd

30 March 2026

About Us

Locksmiths Nominees Pty Ltd (ABN: 43 005 513 164) is a 100-year-old Australian wholesale distribution business headquartered in Melbourne, operating across Australia and New Zealand. We employ over 200 staff and manage a product catalogue in excess of 30,000 SKUs across multiple brands and product categories.

Digital commerce is central to our operations. Approximately 30% of our revenue is generated through online channels, supported by a B2B eCommerce platform serving trade customers across the region. To support our multi-brand strategy, we maintain a portfolio of hundreds of domain names across our operating brands.

We are a significant, long-standing participant in the .au namespace and submit this response as a domain name consumer with a direct and material interest in the fair and effective administration of .au Licensing Rules.

Scope of This Submission

This submission focuses on Issue 2: Domain Name Monetisation in com.au and net.au. We have no contested .au direct domain names and no strong views on the other issues under review. We reserve our position on those matters and support the Advisory Panel in hearing from those directly affected.

Issue 2: Domain Name Monetisation in com.au and net.au

Our Position

We strongly support the prohibition of domain name monetisation in the com.au and net.au namespaces.

Domain name monetisation - the registration of a domain licence solely to sell, lease, park or hold the name for revenue - is inconsistent with the purpose of the com.au and net.au namespaces, which exist to serve Australian commercial entities with genuine business activity.

Impact on Legitimate Businesses

As an operator managing hundreds of domain names across multiple brands, we have direct experience of the commercial harm caused by speculative domain holding practices. The practical consequences for businesses in our position include:

- Brand extension is blocked. When we launch a new product line, extend into a new category, or acquire a complementary business, relevant com.au domain names are

frequently already held by investors with no legitimate connection to the goods or services the name represents.

- Consumer trust is undermined. Parked domains serving pay-per-click advertising, particularly those resembling legitimate brand names, create market confusion and expose customers to misleading content.
- Commercial negotiation is coercive. Where a domain investor holds a name relevant to our business, the only options are to pay an inflated price or forgo the domain. This is not a fair market outcome for businesses with a genuine claim to the name.
- The allocation rules are gamed. The current interpretation of Rule 2.4.4(2)(f)(i) - which allows monetised pay-per-click websites to be characterised as 'providing a service', creates a loophole that undermines the intent of the allocation framework. A domain investor is not providing a service in any meaningful commercial sense to the Australian business community.

The com.au Namespace Has a Unique Purpose

The com.au namespace has always operated under a framework that ties domain name registration to genuine Australian commercial activity. This is, as the Issues Paper acknowledges, a uniquely Australian rule - and one we believe has served the Australian internet community well.

Permitting monetisation within this framework is inconsistent with its intent. The allocation rules exist to ensure domain names reflect genuine business identity. Allowing speculative registration to satisfy those rules through parked advertising pages undermines the effectiveness of the allocation framework.

We note that monetisation is already prohibited in org.au, asn.au, id.au, edu.au and the State and Territory namespaces, precisely because those namespaces are intended to serve genuine registrants. We see no principled reason why com.au and net.au should be treated differently.

Recommended Outcome

We recommend that the Advisory Panel make the following recommendations to the auDA Board:

- Domain name monetisation be explicitly prohibited in the com.au and net.au namespaces, consistent with the prohibition that applies in other .au namespaces.
- Rule 2.4.4(2)(f)(i) be amended to make clear that the establishment of a monetised website does not constitute "provision of a service" for the purpose of meeting allocation requirements.
- auDA develop clear audit and enforcement mechanisms to identify and action domain names held in breach of updated monetisation rules, particularly those presenting pay-per-click or parked advertising pages as qualifying services.

A Note on Transition

We acknowledge that some registrants currently hold com.au and net.au domain names on a monetisation basis. If the Advisory Panel recommends a prohibition, we support a reasonable transition period - we would suggest 12 months - to allow existing monetised registrations to either be converted to legitimate use or released. This balances the need for reform with fairness to existing registrants.

Conclusion

We thank the Advisory Panel for the opportunity to contribute to this review. As a longstanding participant in the .au domain ecosystem, we have a strong interest in rules that ensure the com.au and net.au namespaces remain credible, functional and fair for Australian businesses.

Domain name monetisation in com.au and net.au undermines those goals. We urge the Advisory Panel to recommend its prohibition.

We are happy to discuss this submission further if the Panel has questions.

Submitter Details

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