Ground Floor, 470 St Kilda Road
Melbourne VIC 3004
+61 3 9994 1557
support@masterlocksmiths.com.au

Policy Advisory Panel
.au Domain Administration (“auDA”) – Rules Review Panel
Sent by email: rulesreview25@auda.org.au

Wed, 1 Jul 2026

Dear Policy Advisory Panel

Subject: Feedback – Draft report of the .au licensing rules review 2025

Please find attached feedback from the Master Locksmiths Association of Australasia Limited (“Master Locksmiths”) on the Draft Report of the .au Licensing Rules Review 2025, published in June 2026. As Chief Executive Officer of Master Locksmiths, I appreciate the work undertaken by the Panel and welcome the opportunity to provide further feedback on issues that matter to our members and the wider community.

This feedback responds to the Panel’s draft recommendations and continues to reflect the concerns of our members, particularly around consumer protection, domain integrity, and fair competition in the .au domain space. Master Locksmiths welcomes many aspects of the Draft Report and commends the Panel for recognising the importance of maintaining trust and integrity in key .au namespaces. We also note areas where we believe further action is needed, especially where consumer safety is affected and criminals are able to misuse .au domain names to impersonate legitimate businesses such as locksmiths. In particular, we see this review as an important opportunity to introduce targeted measures that reduce harmful practices, including deceptive domain name monetisation schemes that can facilitate scams in emergency service sectors.

Our detailed feedback addresses all six core issues identified in the review’s Terms of Reference, as well as additional issues raised in the Draft Report. We outline where we support the Panel’s recommendations and where we believe stronger action is warranted. Master Locksmiths remains committed to working constructively with the Panel and auDA, and we would be pleased to provide further information, real-world case studies, or practical assistance if useful.

Thank you for the opportunity to contribute to this important review. Please do not hesitate to contact me on benjamin@masterlocksmiths.com.au if you wish to discuss any aspect of our feedback further.

Yours faithfully

Benjamin Wash
Chief Executive Officer
Master Locksmiths Association of Australasia Limited

MASTER LOCKSMITHS
ASSOCIATION OF AUSTRALASIA

Ground Floor, 470 St Kilda Road
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Feedback in response to the Draft report of the .au licensing rules review 2025

About Master Locksmiths

Master Locksmiths is the peak industry body for the locksmithing profession across Australasia. Our role is to lift standards, protect consumers, and support a trustworthy marketplace for locksmithing services, both online and offline. We represent small and medium enterprises, specialist security technicians, and larger service providers in the locksmithing and physical security sector. Our members are often called when people are locked out, distressed, or in urgent situations. They see firsthand how criminals exploit online channels to mislead and overcharge consumers. We are therefore committed to practical policy measures that improve consumer protection, maintain the integrity of the .au namespace, and support fair trading in the digital environment.

Executive Summary

- **Issue 1 (Allocation rules)** – Master Locksmiths supports maintaining robust allocation requirements in com.au and net.au to preserve trust in the .au space. We continue to urge clearer and tighter criteria (e.g. reinstating a well-defined "close and substantial connection" test) to prevent exploitation of loopholes, ensuring domains have a genuine link to the registrant's identity or services.

- **Issue 2 (Domain Name Monetisation)** – Master Locksmiths remains strongly opposed to monetisation being used as a basis for eligibility in com.au and net.au, due to evidence that monetised domains facilitate harmful practices, including scams and misdirection of consumers seeking emergency services. We urge the Panel to reconsider its draft position of "no change" on monetisation, and to recommend phasing out or significantly restricting monetisation to better protect consumers.

- **Issue 3 (Contested .au direct domains)** – Master Locksmiths remains concerned about the long-term uncertainty and administrative burden of unresolved .au direct contests. While acknowledging the Panel's caution about fairness and *"no hierarchy of rights"*, we advocate exploring a definitive resolution mechanism – such as using earliest registration date as a primary tie-breaker – to gradually finalise these contests (with transitional safeguards) rather than allowing indefinite stalemates.

- **Issue 4 (Fraudulent or bad-faith registrations & Reserved Names)** – Master Locksmiths strongly supports the Panel's recommended changes on Reserved Names. We agree that auDA should remove the requirement to publish the security-sensitive reserved names list, instead publishing only criteria and aggregated transparency data. We also support more proactive cancellation of clearly deceptive or harmful domain registrations and ensuring that once such domains are cancelled, they are reserved to prevent re-registration by bad actors.

- **Issue 5 (Complaints & audits)** – Master Locksmiths endorses the Panel's recommendation to explicitly allow complaints about auDA audit decisions in the Licensing Rules. We also support broadening the definition of an "affected person" to reflect a pro-consumer approach, while

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emphasising that complainants should demonstrate a specific, material interest in the domain name to prevent vexatious or purely anti-competitive complaints.

- **Issue 6 (Alignment with gTLD lifecycle practices)** – Master Locksmiths fully supports the Panel's proposed alignment of key .au domain lifecycle rules with common international best practices (e.g. longer post-registration cooling-off, standardised redemption and purge periods, removing the 90-day renewal window restriction), which align with our earlier recommendations and will benefit both registrants and registrars in terms of consistency and security.

In summary, Master Locksmiths supports many of the Panel's proposed reforms to improve clarity, predictability, and alignment with international practice. However, the primary policy objective must remain the reduction of consumer harm, particularly from criminals exploiting .au domains to pose as locksmiths and similar emergency service providers.

Detailed responses to issues

Issue 1: Allocation rules for com.au and net.au

The Panel's Draft Report recognises that the allocation rules in com.au and net.au are fundamental to maintaining public trust in these commercial namespaces. In particular, the Panel observes that confidence in com.au is "supported by allocation rules that are more aligned on the connection between a domain name and the registrant's business," making .com.au a trusted identifier for genuine Australian enterprises. Master Locksmiths fully agrees with this principle – a clear link between a .au domain and the registrant's identity or services is essential for .au to retain its integrity and value.

However, our members and other stakeholders have noted that current allocation criteria (such as the "close and substantial connection" alternatives under Rules 2.4.4(2) and 2.4.5(2)) have become overly broad or ambiguous, allowing tactical compliance without genuine connection. During consultation, participants voiced that the rules are often "complex and misaligned with their intent," with loopholes enabling technically compliant but "illegitimate" uses. Specifically, the practice of registering a business name solely to obtain a domain (including for the purposes of pay-per-click advertising) was raised as an example of a compliance loophole that defeats the policy's intent to ensure a meaningful link to the registrant's activities.

Recommendation (Issue 1): Master Locksmiths continues to recommend that auDA strengthen the allocation rules for com.au and net.au by reintroducing a clearly defined "close and substantial connection" test for those namespaces, supported by updated guidance with bright-line examples. This would reduce ambiguity and deter misuse of .com.au and .net.au domain eligibility requirements. This is especially important in service industries. For example, a generic or location-based domain name such as "SydneyCityLocksmiths.com.au" should only be allocated if the applicant genuinely operates a locksmith business by that name, or can demonstrate a legitimate trading or registered name connection. It should not be enough to establish a placeholder website claiming to offer locksmith services. We endorse the Panel's emphasis on preserving a strong connection between .com.au domains and their owners' real-world credentials, but urge clearer, enforceable allocation criteria to achieve that goal.

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ASSOCIATION OF AUSTRALASIA

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

Master Locksmiths acknowledges the diverse views on domain monetisation reflected in the Draft Report and Listening Report, and the Panel's finding that there was no clear consensus path forward on this issue. The Panel's Draft Report notes "strong and diverging views" – with many small businesses, a business association, cybersecurity experts, and members of the public calling for monetisation to be removed entirely from com.au and net.au due to its negative effects. This aligns with our position in our original March 2026 submission, where we emphasised that monetisation incentivises speculative domain holdings, misdirects consumers, and undermines trust – especially in emergency service contexts like locksmithing, when consumers seeking urgent help are vulnerable. The public consultations similarly found that monetisation is widely viewed as harmful to the community, concentrating benefits to a few actors while depriving legitimate businesses of relevant domain names.

We appreciate the Panel's thorough evaluation of options for addressing monetisation (including maintaining the status quo, introducing stricter rules for monetised sites to prevent harm, or removing monetisation as an allocation basis entirely). The Panel's draft recommendations, however, indicate no immediate rule change – i.e. keeping monetisation permissible in com.au, net.au, and .au direct – and instead consider increasing audits and compliance checks on monetised domains to ensure they are not facilitating scams or other abuse. We respectfully urge the Panel to reconsider this approach. While we support stronger compliance efforts, we maintain that the optimal policy solution is to phase out (or significantly narrow) monetisation as an eligible reason for holding a com.au or net.au domain name. Removing monetisation as an allocation basis (currently allowed by Rule 2.4.4(2)(f)(i) and defined in Rule 1.4 of the .au Licensing Rules) would directly address many stakeholder concerns by disincentivising purely speculative registrations and pay-per-click websites that confuse or mislead consumers.

It is important to recognise that monetisation can cause real harm. Even if conducted within technical policy bounds, monetised "parking" websites often create a poorer experience for consumers and, as the Panel acknowledged, can inadvertently link to scams or malicious content. In one instance noted in the Draft Report, a monetised site was reported to have provided advertising links to scam websites (p.8) – illustrating the real dangers to public confidence. In industries like locksmithing, these practices enable criminal "scam" operators to register generic service domains, populate them with ads or superficial content, and intercept customers seeking urgent help. The result is consumer harm (exorbitant fees, unqualified operatives posing as legitimate locksmiths, or worse) and damage to the reputation of genuine businesses.

Recommendation (Issue 2): Given these risks, Master Locksmiths continues to strongly advocate for removing domain monetisation as an allocation criterion in the regulated commercial namespaces (.com.au and .net.au). We recognise the Panel's concerns about transitional complexity and legal risk, but believe these can be managed through an appropriate transition period and grandfathering arrangements for existing licences. The cost of inaction — ongoing consumer harm and erosion of trust — outweighs the challenges of change. If the Panel maintains its position of no immediate rule change, we urge that the final recommendations at least include robust measures to intensify monitoring and enforcement against misuse of monetised domains, including targeted audits and swift suspension of monetised sites that facilitate scams or other prohibited activities. We also

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encourage the Panel to signal its willingness to phase out monetisation over time if evidence of harm continues to mount.

Issue 3: Contested .au direct domain names

The Panel's Draft Report indicates that despite a range of views on how to resolve contested .au direct names (including suggestions for change), no clear consensus emerged and the Panel therefore recommends retaining the current arrangements, i.e. the existing negotiation-based process. We understand the Panel's reasoning – that all parties engaged in a contest had clear notice of the existing process and that declaring any party "more deserving" could conflict with foundational principles like "first come, first served" and "no hierarchy of rights" in .au.

Nonetheless, Master Locksmiths remains concerned that leaving contested .au direct domain names unresolved indefinitely is not in the best interests of the Australian community. It prevents potentially valuable domains from being put to use and creates ongoing administrative burden. We continue to favour a definitive resolution mechanism based on objective criteria, such as awarding contested .au direct names to the applicant with the earliest original registration date of the matching 2LD, as proposed in our March 2026 submission. We note that some stakeholders in the consultation also supported exploring lower-burden, faster resolution methods, provided fairness concerns are addressed. While mindful of the Panel's caution, we suggest the Panel could recommend that auDA develop a pathway to gradually conclude long-running contests. This might involve encouraging voluntary resolution during a defined period, after which a neutral criterion such as earliest registration date is applied if needed. Such an approach would uphold fairness while restoring certainty and ensuring .au direct names can eventually be allocated and used.

If the Panel remains disinclined to alter the current contested name framework at this stage, we urge that this issue be explicitly revisited in a future review to ensure it does not persist indefinitely. Master Locksmiths stands ready to contribute constructively to any further discussion on finding a balanced solution for contested .au direct domains that protects trust in .au without disadvantaging legitimate registrants.

Issue 4: Fraudulent and bad-faith registrations & Reserved Names

Master Locksmiths strongly supports the Panel's draft recommendations on addressing fraudulent or malicious .au domain registrations and improving the management of Reserved Names. The Panel correctly notes broad consensus around the importance of a reserved names mechanism to protect the public interest. We agree with the Panel's finding that publishing the exact names on the security-sensitive Reserved Names List may inadvertently provide a "playbook" for offenders. As reflected in our original submission, we believe confidentiality of such names is prudent and beneficial for security. We therefore endorse Recommendation 4.1 to remove the requirement to publish the security-sensitive Reserved Names List. Instead, we support Recommendation 4.2, which calls on auDA to publish the criteria for placing names on the reserved list and to release aggregate statistics, such as the number of names reserved, number of reversed registrations, and average time from detection to reservation. This would support transparency and accountability without disclosing the specific terms. It will help maintain public trust and deterrence while not tipping off potential bad actors, and is consistent with the National Anti-Scam Centre's input to the review.

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In addition, Master Locksmiths encourages auDA to continue improving proactive detection and remediation of fraudulent domain registrations. We agree with stakeholders who suggested that swift cancellation (and subsequent reservation) of clearly deceptive or dangerous domain names is necessary to reduce consumer harm. Indeed, our March 2026 submission recommended enabling expedited suspension or cancellation of domains posing credible, immediate risks – such as phishing sites or those impersonating emergency service providers – as well as blocking their re-registration. The Panel's Draft Report notes that .au already has a strong anti-abuse capability, with one of the "most secure" global TLD zone reputations. We support maintaining and enhancing this capability, for example by streamlining the process for law enforcement or regulators to flag fraudulent domains for rapid action under existing provisions (such as Rule 2.17 Public Interest suspension and cancellation). Through these measures, the .au rules can better protect consumers from criminals who exploit domain names to perpetrate scams.

Issue 5: Complaint process for domain name audits & standing of "affected persons"

Master Locksmiths is pleased to see the Panel addressing stakeholder concerns about the complaints and appeals processes. We fully support Recommendation 5.1, which would amend the .au Licensing Rules to explicitly allow complaints arising from auDA-initiated audits (Panel Draft Report, June 2026, p.13). This change acknowledges that registrants or other parties should have recourse if they believe an audit-related action was improper or unjustified.

We also support the intent behind Recommendation 5.2 to broaden the scope of an "affected person" eligible to seek internal or external review of an auDA decision. The Panel's draft discussion suggests that any party who can "demonstrate an interest in the domain name" should have standing to challenge a decision, aligning with a pro-consumer approach and reflecting current practice. Master Locksmiths recognises the importance of enabling third parties — including regulators, rights holders, or genuinely impacted individuals — to trigger reviews where necessary to protect the public or business community. However, any broadened standing requirement should still include a threshold that prevents purely speculative or vexatious complaints. We recommend explicitly requiring complainants to demonstrate a specific, material interest in the domain name beyond that of a typical member of the public. This would discourage misuse of the complaints process while preserving robust accountability for auDA decisions.

Issue 6: Alignment of .au domain lifecycle with gTLD practices

Master Locksmiths supports the Panel's consideration of aligning .au domain lifecycle rules with global best practice. We strongly support Recommendation 6 (Panel Draft Report, June 2026, p.58), which proposes to:

- Remove the current 90-day limit on domain licence renewals (allowing registrants to renew at any time during a licence's term),
- Extend the post-registration cooling-off (grace) period from 3 days to 5 days for new registrations,
- Standardise a 30-day redemption period for expired domains, and
- Increase the pending delete (purge hold) period from 1 day to 5 days.

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These changes mirror the suggestions we made in our March 2026 submission and reflect what was heard from registrants and registrars in the review process. We agree that these measures will reduce user confusion and better protect registrants, while simplifying operations for registrars through consistency with widely used international domain lifecycles. We also support the Panel's call to formally incorporate these domain lifecycle parameters into the .au Licensing Rules themselves, so key provisions are located in one place. Consolidating lifecycle rules within the Licensing Rules will make the policy more accessible and easier for stakeholders to understand. The proposed changes appropriately maintain existing eligibility checks upon renewal, which is important for preserving integrity. Overall, aligning .au with established gTLD lifecycle practices is a practical step that improves both security and usability of the .au domain space.

Additional issues considered by the panel

Beyond the six core Terms of Reference issues, the Draft Report also discusses several other topics raised during consultations. Master Locksmiths offers brief feedback on these additional issues:

A. **Improving Privacy in the WHOIS Database** – Master Locksmiths supports steps to enhance privacy for individuals in the WHOIS database, as long as essential transparency and accountability are not compromised. We agree with the Panel's suggestion to encourage the use of role-based contact information (generic email addresses such as "admin@company.com.au" in WHOIS records) so that registrants can limit the publication of personal data like individual names or direct contact details. This pragmatic approach – which aligns with section 2.8.1 of the auDA Registrar Rules – addresses privacy concerns while still ensuring that a point of contact (associated with the correct entity) is available for each domain name. We believe this strikes an appropriate balance between individual privacy rights and the community's need to identify and reach domain licence holders when necessary.

B. **Including Scams within the Scope of the .au Licensing Rules** – Master Locksmiths welcomes the Panel's consideration of online scams and their intersection with the .au domain space. The Panel rightly highlights the concern that some .au domains may be used for scam websites even while technically complying with current Rules, and notes that criminals have abused expired domains and misused Australian Business Numbers to defraud users. Given the locksmithing industry's first-hand experience with this problem – where opportunistic actors register domains mimicking local locksmith services to prey on consumers in urgent situations – we consider scam prevention a top priority.

   We appreciate and accept the Panel's rationale that it may not be feasible or desirable for the Licensing Rules themselves to directly list "scams" as a new prohibited category at this time. Instead, we support Recommendation 7, which advises retaining the current approach — relying on existing provisions against unlawful use and public interest takedowns — and encourages continued collaboration between auDA and the National Anti-Scam Centre ("NASC") to refine domain takedown processes. The Panel also sensibly recommends revisiting scams explicitly in the next Licensing Rules review, expected in around three years, so that .au policies can adapt to evolving scam tactics and technologies.

   Nevertheless, Master Locksmiths urges auDA and the Panel to consider interim measures that can be taken now to reduce scam-related harm within the .au space. These could include dedicating greater compliance resources to high-risk categories (for instance, patterns of domain

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registrations in sectors prone to scams like emergency trades), enhancing public awareness and reporting channels for suspected scam domains, and ensuring law enforcement requests for domain suspension (under existing "public interest" rules) are processed without delay. Such actions, in parallel with the Panel's recommendations, will help ensure that .au remains a safe and trusted space for all users.

C. **Communications to Registrants about Renewals and Cancellations** – Master Locksmiths supports the Panel's focus on improving communications to registrants regarding domain renewal and cancellation. As highlighted by stakeholders, the failure of some registrants to receive timely renewal notices has led to unintentional expirations and loss of valued domain names, sometimes resulting in those domains being snapped up by others (including speculators) and causing significant harm to the original holder. We agree that it is important to address the source of such problems by mandating clearer, more proactive registrar notification obligations. Master Locksmiths therefore supports Recommendation 8, which would include in the .au Licensing Rules explicit requirements for registrars to contact registrants (via multiple channels if necessary) before a licence expiry, suspension, or cancellation, and to maintain accurate registrant contact details. Ensuring registrants are adequately warned of pending renewals, and confirming their contact information regularly, will reduce accidental domain loss and improve confidence in the system. We encourage auDA to work closely with registrars on practical implementation, such as using alternative contact methods (like SMS or secondary emails) if primary contacts are unresponsive.

D. **Retaining a com.au after Business Closure or Retirement** – Finally, in relation to suggestions that individuals be permitted to keep a .com.au domain name after ceasing to operate a business, including upon retirement, Master Locksmiths recognises the sentimental value and historical branding associated with longstanding domains. However, we agree with the Panel's position that the integrity of the com.au namespace as a bona fide commercial space must be preserved. Under current rules, a registrant must remain a commercial entity to hold a com.au or net.au domain. This is a cornerstone of what differentiates those spaces as trusted indicators of active businesses. We therefore support Recommendation 9, which does not create a new eligibility exemption for retired business owners, but instead encourages flexibility through compliance assistance, such as working with registrants to transition their web presence to a more appropriate namespace if they no longer qualify for com.au. This approach avoids eroding the credibility of the commercial 2LDs while still providing a fair pathway for individuals to retain an online presence after business closure if desired.

Conclusion

Master Locksmiths thanks the Panel for considering our feedback. We remain deeply invested in the outcomes of the .au Licensing Rules Review 2025, as the final rules will have significant implications for consumer trust and industry fairness in our sector. The Draft Report has made substantial progress toward practical improvements. With the additional suggestions outlined above, particularly those aimed at combating fraudulent domain practices and protecting consumers in vulnerable situations, the final recommendations can help ensure the .au domain space continues to serve the best interests of all Australians.

Ground Floor, 470 St Kilda Road
Melbourne VIC 3004
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We appreciate your consideration of our feedback and would be pleased to discuss any aspect of this submission further if that would assist the Panel's work.

References

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[End of feedback]