

Mon, 23 Mar 2026

Policy Advisory Panel
auDA — Rules Review Panel

Sent by email: rulesreview25@auda.org.au

Dear Policy Advisory Panel

Subject: .au Licensing Rules Review 2025 — Submission from Master Locksmiths

Please find attached the submission from the Master Locksmiths Association of Australasia Limited (“Master Locksmiths”) regarding the .au Licensing Rules Review 2025. As CEO, I welcome the opportunity to contribute to this important consultation process. The submission reflects the concerns and priorities of our members, particularly around consumer protection, domain integrity, and fair trading in the digital environment.

If the Panel requires further information, case studies, or confidential supporting documentation, I would be pleased to provide it.

Yours faithfully



Benjamin Wash
Chief Executive Officer
Master Locksmiths Association of Australasia

.au Licensing Rules Review 2025 — Submission

From: Master Locksmiths Association of Australasia (“Master Locksmiths”)

To: Policy Advisory Panel, auDA

Date: Mon, 23 Mar 2026

Contact: Benjamin Wash — CEO, Master Locksmiths

Email: benjamin@masterlocksmiths.com.au

1. About Master Locksmiths

Master Locksmiths is the peak body for the locksmithing industry across Australasia. Our members include small and medium enterprises (SMEs), specialist security technicians, and larger multi-site service providers. Our mission is to lift standards, protect consumers, and support a trustworthy locksmithing marketplace—online and offline.

Locksmithing businesses are disproportionately targeted by misleading and fraudulent online practices, especially in emergency lockout scenarios where consumers are vulnerable, time-poor, and reliant on search results or online ads. Policy settings governing the allocation, use, and integrity of .au domains therefore have a direct impact on consumer safety, fair competition, and the reputation of legitimate locksmiths.

Master Locksmiths welcomes the opportunity to contribute to the .au Licensing Rules Review 2025 and address the six issues identified by the Policy Advisory Panel.

2. Executive Summary of Positions

- Issue 1 (Allocation rules): Support clearer and tighter allocation in com.au and net.au to ensure a genuine, demonstrable link between the registrant and the domain name; reject monetised websites as a proxy for a legitimate “service” connection. Prefer a modernised “close and substantial connection” test with bright-line examples relevant to service industries.
- Issue 2 (Monetisation): Oppose monetisation as a basis for allocation in com.au and net.au; it drives keyword hoarding, consumer confusion, and misdirection—especially harmful in emergency services.
- Issue 3 (Contested .au direct): Prefer earliest eligible registration date as the primary tie-breaker; oppose auctions that disadvantage SMEs. Use status quo only as a fallback.
- Issue 4 (Fraudulent/bad-faith & reserved names): Support removing the publication requirement for the security-sensitive reserved names list; encourage proactive cancellation and reservation where domains create material risk.
- Issue 5 (Complaints & audits): Explicitly include audit-action complaints; clarify “affected person” to prevent vexatious escalations while preserving fair review rights.

- Issue 6 (Alignment with gTLD lifecycle): Support extending cooling-off to 5 days, standardising 30-day redemption, extending pending purge to 5 days, reassessing the 90-day renewal window cap with safeguards, and incorporating lifecycle rules into the Licensing Rules.

3. Responses to Consultation Questions

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

- Support a closer, clearer, and enforceable connection between registrant and domain; current “Match or Synonym” is ambiguous.
- Do not remove allocation requirements; that would invite speculative or misleading registrations and increase consumer harm.
- Oppose recognising monetisation as a “service” for allocation; it dilutes identity linkage and invites keyword hoarding.
- Prefer a modernised “close and substantial connection” with plain-English examples for service industries.

Suggested drafting direction:

- Reintroduce “close and substantial connection” with an illustrative, non-exhaustive list (legal name, registered business name, registered trademark, long-standing trading name with evidence, clearly identifiable service descriptors used by the registrant).
- Exclude purely generic, location-plus-service names unless backed by evidence of legitimate use and identity.
- Prohibit monetised placeholder content as evidence of a service connection.

Issue 2: Domain name monetisation in .com.au and .net.au

- Monetisation as eligibility incentivises speculative holdings, diverts legitimate traffic, and normalises deceptive landing pages.
- Emergency services (like locksmithing) face higher risk of misdirection, overcharging, and scams; the namespace should prioritise authentic identity and trust.

Recommendation: Amend Rule 2.4.13 to disallow monetisation as a qualifying path for allocation and clarify that parking/pay-per-click pages are not “services” under Rule 2.4.4(2)(f)(i).

Issue 3: Contested .au direct domain names

- Adopt earliest eligible registration date as the primary resolution rule to recognise established market presence and avoid wealth-based allocation.
- Retain negotiation/withdrawal only as fallback where dates are identical or otherwise indeterminate.

- Oppose auctions due to SME disadvantage, speculative bidding risk, and potential for post-allocation misuse.

Issue 4: Fraudulent and bad-faith registrations & reserved names

- Remove the publication requirement for security-sensitive reserved names; non-publication avoids creating a playbook for offenders.
- Support faster cancellation for clearly deceptive registrations and proactive reservation to prevent re-registration.

Issue 5: Complaint process for domain name audits

- Explicitly include complaints arising from audit actions to reflect auDA practice and natural justice.
- Clarify “affected person” so standing includes registrant, directly impacted parties (e.g., a business with a registered mark/business name), and regulators/law enforcement where public harm is alleged.
- Adopt a simple standing test: the applicant’s interest must be distinct and material compared to the general public.

Process improvements: publish plain-English guidance; maintain time-bound service levels; offer low-cost internal review before external escalation.

Issue 6: Alignment of selected .au rules with gTLD practice

- Extend cooling-off from 3 to 5 days.
- Standardise a 30-day redemption period and extend pending purge to 5 days.
- Reassess the 90-day renewal cap with safeguards against confusing or unsolicited renewal solicitations.
- Codify lifecycle rules currently in separate policies into the Licensing Rules.

4. Additional Recommendations Relevant to Consumer Protection

- Introduce priority audit triggers for high-risk categories (e.g., emergency trades such as locksmithing), including patterns like location-plus-service domains that lack clear identity evidence.
- Require verifiable artefacts (ASIC/ABN, business name registrations, trademarks, or longstanding trading use) for service-descriptive domains.
- Enable expedited suspension for domains posing credible, immediate risk (e.g., phishing, fake emergency services).
- Replace public reserved-name lists with aggregated transparency reporting and publish case studies that educate registrants and consumers.

5. Draft Rule Concepts (for the Panel's consideration)

- Close and substantial connection (modernised): A domain name has a close and substantial connection to the registrant where it is reasonably and recognisably linked to the registrant's legal or trading identity, registered IP, or core services as evidenced by public records and regular use. Monetisation or parking does not constitute a service for this purpose.
- Monetisation exclusion (allocation): A domain name registered primarily for advertising arbitrage, parking, resale, or leasing does not satisfy allocation requirements for com.au or net.au.
- Standing (complaints): An "affected person" is a person or entity whose interests are materially and distinctly impacted by the decision under review, beyond the interest of a member of the public.
- Reserved names confidentiality (security): Reserved names lists created to mitigate security or integrity risks need not be published; auDA must publish periodic transparency summaries.
- Lifecycle alignment: Cooling-off: 5 days; Redemption: 30 days; Pending purge: 5 days; Renewal window: remove 90-day cap subject to registrar conduct safeguards; incorporate lifecycle rules into the Licensing Rules.

6. How Our Positions Advance the Review Objectives

- Effective and fair operation: Clearer allocation and tighter standing reduce gaming, litigation risk, and administrative burden, while preserving fair access.
- Security, stability, and integrity: Confidential reserved lists and expedited response to harmful domains limit exploitability and consumer harm.
- Public benefit: Consumers gain greater confidence that a .au locksmith domain represents a genuine, accountable Australian business, improving outcomes in urgent service situations.

7. Publication, Confidentiality, and Contact

Master Locksmiths consents to publication of this submission. If further detail would assist the Panel—particularly case studies on locksmith domain impersonation—we can provide additional material in confidence upon request, consistent with the review's confidentiality provisions.

Primary contact: Benjamin Wash, CEO, Master Locksmiths

Email: benjamin@masterlocksmiths.com.au

Appendix A — References and Key Links

- .au Domain Administration Rules: Licensing — [Link](#)
- 2012 Guidelines on Interpretation of Policy Rules for Open 2LDs (Section 11) — [Link](#)
- Licence Review Panel decision: australianaviation.com.au (9 Mar 2023) — [Link](#)
- Licence Review Panel decision: fordpro.com.au (27 Jun 2025) — [Link](#)
- auDA .au direct Priority Status Tool — [Link](#)
- Domain Renewal, Expiry and Deletion Policy — [Link](#)