



Submission on Proposed Updates to Schedule A of the .au Domain Administration Rules: Licensing

1 May 2026

auDA Policy Team

au Domain Administration Ltd
Level 19, 8 Exhibition Street
Melbourne VIC 3000

Subject: Submission on Proposed Updates to Schedule A of the .au Domain Administration Rules: Licensing

Dear auDA Policy Team,

Thank you for the opportunity to provide feedback on the proposed updates to Schedule A of the .au Domain Administration Rules: Licensing.

I am writing on behalf of the Scientific Research Development Institute of Technology Australia Pty Ltd, trading as SRDITA. SRDITA is an Australian Registered Training Organisation and CRICOS provider based in Queensland, delivering vocational education and training in surveying and spatial information services.

SRDITA supports the purpose of the proposed updates. The edu.au namespace has an important role in protecting trust, credibility and public confidence in Australian education and training providers. It is important that the eligibility rules remain clear, current and practical for the range of providers now operating in the Australian education sector.

Recognition of Registered Training Organisations and CRICOS providers

SRDITA supports the continued recognition of Registered Training Organisations as eligible education and training entities. RTOs operate under a formal national regulatory framework and deliver nationally recognised training. It is appropriate that RTOs registered with the relevant authority and recorded on the National Register on Vocational Education and Training continue to be recognised within the edu.au eligibility framework.

SRDITA also supports the continued recognition of Bodies Serving Overseas Students. Providers listed on CRICOS are subject to additional requirements under the ESOS framework and play an important role in Australia's international education sector.



These providers should continue to be recognised as genuine education and training entities for edu.au eligibility purposes.

National interests and responsibilities

SRDITA supports the proposed clarification of National Interests and Responsibilities, particularly the inclusion of entities registered or accredited with a Commonwealth education or training authority. This is a practical and useful change. Many education and training providers may be based in one State or Territory but operate under national regulation, serve national workforce needs, or deliver training to students across jurisdictions.

For vocational education and training, national regulation is particularly important. A provider may have one principal campus but deliver training to students from several States and Territories through online, blended, distance, workplace or block delivery models. In these cases, evidence such as enrolment records, delivery schedules, CRICOS registration, national VET registration, training and assessment strategies, or student cohorts from multiple jurisdictions should be accepted as evidence of broader national education activity.

Domain names and connection to the education provider

SRDITA supports the intention to prevent domain names that are made up only of generic education or training terms. This is important to avoid unfair advantage and to maintain confidence in the edu.au namespace.

At the same time, the rules should be applied carefully so genuine education providers can still use domain names that are clearly connected to their legal name, trading name, acronym, registered business name, or an approved education program. The current approach, which allows a domain name to be an exact match, closely connected to the name of the person, an acronym, or related to a project or program administered by the applicant, should be retained and applied in a balanced way.

Eligible referees

SRDITA notes the proposed changes concerning eligible referees and related entities. We agree that referees should be independent and credible. However, for small or specialised education providers, especially new RTOs or niche training providers, it may sometimes be difficult to identify suitable referees who already hold an edu.au licence and have no related interest.

We recommend that auDA provide clear practical guidance on acceptable referees, particularly for small RTOs, CRICOS providers, specialist training organisations and regional providers. This guidance would help applicants understand what evidence is required and reduce uncertainty during the application process.



Legacy domain names

SRDITA supports the proposed exemption for longstanding domain names registered in good faith under earlier rules. This is a sensible measure, provided it is limited and does not weaken the integrity of the edu.au namespace. It is reasonable to manage a small number of legacy names while keeping the current rules clear for new applicants.

Summary

In summary, SRDITA supports the proposed updates to Schedule A. We recommend that auDA ensure the final guidance remains clear, practical and fair for RTOs, CRICOS providers, specialist training providers and smaller education organisations operating under recognised Australian regulatory frameworks.

Thank you for considering this submission.

Yours sincerely,

Prof. Kalum Udagepola

Chief Executive Officer

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