From:	Targeted SEO Services
To:	LRreview
Subject:	[EXTERNAL] - Submission on .au Licensing Rules Review - Strong Opposition to Removing Rule 2.4.4(2)(f)
Date:	Wednesday, 8 July 2026 4:54:47 AM

Dear Policy, Advisory Panel,

I am writing to express my strong opposition to any proposal to delete paragraph 2.4.4(2)(f) of the .au Licensing Rules or otherwise introduce changes that would unfairly restrict legitimate Australian businesses, domain registrants, website developers and domain investors from holding and developing lawful .com.au and net.au domain names.

I am an Australian small business owner, SEO consultant, website developer, and holder of multiple .au domain names. I use domain names for genuine commercial purposes, including the development of websites, lead generation, online business projects and future business opportunities.

After reading the June 2026 Policy Advisory Panel Draft Report, I am particularly concerned about Recommendation 2 and the option to:

"Delete sub para (f) from section 2.4.4(2) of the .au Licensing Rules."

I strongly oppose this option.

The proposed response is disproportionate to the evidence presented

The Draft Report itself states that the Panel does not believe the current approach to Domain Name Monetisation should be substantially changed because there is a lack of evidence that monetising a website inherently undermines trust and confidence in the .au namespace.

The Panel therefore recommends under Recommendation 1 that domain monetisation continue.

However, Recommendation 2 then considers deleting paragraph 2.4.4(2)(f), which is one of the main pathways that allows legitimate commercial entities to establish the required connection between a domain name and the services, goods, events, activities or premises associated with their business.

These positions are difficult to reconcile.

If there is insufficient evidence to justify substantially changing domain monetisation, there is even less justification for removing an entire allocation pathway that affects a far broader range of legitimate commercial activity.

Rule 2.4.4(2)(f) is not simply a domain monetisation rule

Paragraph 2.4.4(2)(f) allows a domain name to be a match or synonym of:

- a service the registrant provides
- goods the registrant sells
- an event the registrant registers or sponsors
- an activity the registrant facilitates, teaches or trains or
- premises the registrant operates

Deleting the whole paragraph because of concerns about some pay-per-click

websites would be an extremely broad response.
It would affect many legitimate Australian businesses that have nothing to do with questionable advertising, scams, or DNS Abuse.
Australian businesses frequently register descriptive and generic domain names connected with services they provide. These domains may be used for individual business projects, marketing campaigns, lead-generation websites, future product or service development, geographic expansion, brand protection, and other legitimate commercial purposes.
These are normal online business activities.
The Panel itself acknowledges that the service definition is used by a range of registrants, including corporate registrants that maintain larger domain portfolios for brand protection.
It would be unreasonable to remove the rights of all legitimate registrants because of concerns about the conduct of a small number of websites.

The report does not establish that domain investment causes scams

The Draft Report refers to concerns that pay-per-click advertisements could potentially lead users to scam websites.
However, the report also states that during consultation there was one report of a monetised website providing advertisements linking to scam websites and that **auDA had not seen evidence of this in its complaints data**.
That is an extremely important point.
Major restrictions on legitimate Australian domain holders should not be introduced based on perceptions, isolated reports, or assumptions where auDA's own complaints data does not demonstrate a widespread problem.
Policy should be based on clear evidence of actual harm.
If a domain is being used for phishing, malware, fraud or another form of DNS Abuse, action should be taken against that domain and registrant.
However, lawful domain ownership, domain development, domain resale, and domain monetisation should not be treated as equivalent to abuse.

Existing compliance powers should be used against actual wrongdoing

Of the three options presented under Recommendation 2, I strongly support the first approach:
Increase compliance checks in relation to the current rules.
The Draft Report already recommends increasing audits and compliance checks on monetised websites to prevent DNS Abuse.
This is a much more reasonable and proportionate response.
Target the actual bad actors.
Investigate domains where there is evidence of:

- scams
- phishing
- malware

- fraudulent conduct
- deliberate DNS Abuse or
- false claims of compliance

Do not remove legitimate allocation rights from every Australian business and registrant because some websites may be non-compliant.

Deleting paragraph 2.4.4(2)(f) would create unnecessary uncertainty

Removing paragraph 2.4.4(2)(f) could create enormous uncertainty for existing .com.au and net.au registrants.

Many Australian businesses have invested significant amounts of time and money developing websites and business projects around descriptive domain names that relate to services or goods they provide.

Businesses make commercial decisions based on the rules that exist at the time.

A major change to those rules could leave existing registrants uncertain about:

- whether they can continue to renew their domains
- whether they remain eligible
- whether existing website projects will be affected
- whether future development plans remain viable
- whether domains held for legitimate business expansion remain compliant and
- whether established digital assets could suddenly become vulnerable to complaints

This would reduce, rather than increase, trust and confidence in the .au namespace.

The secondary market is a legitimate part of the domain name system

The Draft Report acknowledges that the trading and transfer of domain name licences in a free market is consistent with Australia's market economy and international practice.

That acknowledgement is important.

The fact that one person registers a domain before another person does not make the first registrant illegitimate.

The Draft Report also correctly recognises that there is no hierarchy of rights in the .au domain system. A trademark owner does not automatically have a better right to a domain than a business-name holder or a person providing a legitimate service.

These principles should be preserved.

A secondary market also gives businesses access to domain names that would otherwise remain permanently unavailable.

Domain names are bought and sold because they have commercial value, just as websites, business names, intellectual property and other digital assets can have commercial value.

The existence of a resale market should not be treated as evidence of wrongdoing.

A domain investor is not automatically a bad actor

I am concerned by the repeated implication throughout the policy debate that domain investors primarily exist to prevent "legitimate" small businesses from

obtaining domains.
A domain investor can also be:

- an Australian small business owner
- a website developer
- a digital entrepreneur
- an SEO consultant
- a lead-generation business
- a startup founder or
- someone developing future Australian online businesses

These categories are not mutually exclusive.
Many people who hold multiple domains actively develop websites, create Australian content, generate business leads, build new services and contribute to the Australian digital economy.
The number of domains a registrant owns does not determine whether that registrant is legitimate.
Conduct should be regulated based on evidence of harmful or unlawful activity, not on portfolio size or business model.

The proposed deletion could make .au domains less attractive

Australian businesses and digital entrepreneurs have choices.
If .com.au and net.au rules become overly restrictive, unpredictable or subject to changing interpretations, registrants may increasingly choose other extensions.
A policy intended to improve confidence in .au could therefore have the opposite effect by discouraging investment and development in the Australian namespace.
Rules should be clear, stable and predictable.
A person who complies with the rules should be able to invest in a domain and develop a project without fearing that a future policy change will suddenly make that investment non-compliant.

My preferred approach

I ask the Panel to:

1. **Retain paragraph 2.4.4(2)(f).**
2. **Reject the option of deleting paragraph 2.4.4(2)(f) from the Licensing Rules.**
3. **Use existing compliance and enforcement mechanisms against domains involved in genuine DNS Abuse.**
4. **Increase targeted compliance checks where there is evidence of non-compliance rather than imposing broad restrictions on all registrants.**
5. **Clearly distinguish legitimate domain investment, development, resale and monetisation from scams, fraud and DNS Abuse.**
6. **Avoid imposing new requirements unless there is clear and measurable evidence that the current rules are causing widespread harm.**
7. **Ensure that any future tightening of rules is narrowly targeted at the actual**

harmful conduct identified and does not remove legitimate service, goods, activity, event or premises-based allocation rights.

8. **Protect existing registrants from retrospective harm if any allocation rules are changed.**

Final position

I support sensible measures that improve trust, reduce scams, and prevent DNS Abuse in the .au namespace.

However, deleting paragraph 2.4.4(2)(f) is not a targeted anti-scam measure.

It would remove a broad and legitimate allocation pathway used by Australian businesses and other commercial registrants.

The Draft Report itself acknowledges that there is a lack of evidence that domain monetisation inherently undermines trust in the .au namespace. It also recognises legitimate domain trading, corporate portfolio use and the longstanding principle that there is no hierarchy of rights between eligible registrants.

The appropriate response is therefore to enforce the rules against actual wrongdoing, not to remove legitimate rights from compliant Australian registrants.

I strongly urge the Panel to reject the deletion of paragraph 2.4.4(2)(f) and retain the existing allocation pathway.

Yours sincerely,

Allan Shaw

Australian small business owner and .au domain registrant