

.au Domain Administration Ltd
PO Box 18315
Melbourne VIC 3001

August 13, 2021

Re: Feedback submission on auDA's proposed strategy for 2021–2025

To Whom It May Concern;

Tucows welcomes the opportunity to submit feedback on auDA's proposed strategy for 2021–2025. Tucows has been an auDA-accredited registrar for a decade and manages more than 170,000 .au domains across the wholesale brands OpenSRS, Enom, and Ascio. We therefore have a strong interest in how auDA strategy is developed and implemented over the coming years and appreciate the chance to share our perspective.

Tucows has consistently reinforced its view that a country-code top-level domain registry is—and should be operated as—a public asset. As an important component of a nation's critical infrastructure, the registry should have a narrow and focused mandate, deliver a stable and secure service, operate in a risk-averse manner, and manage costs appropriately. In addition, the registry should continually engage with its registrars in order to better serve registrants—the registry's ultimate customers.

Based on this perspective and our experience in collaborating with auDA, please find our comments on the Consultation Paper 'auDA 2021–2025 Proposed Strategy' below. These comments are divided into sections, according to the four questions defined in auDA's consultation framework.

1. Does auDA's proposed 2021–25 Strategy establish a clear strategic direction for the organisation?

auDA's proposed 2021–25 Strategy does indeed establish a clear strategic direction for the organisation. However, the strategy proposal asserts far too broad a strategic mandate for auDA. Tucows supports many of auDA's strategic focus areas, especially those in support of a trusted .au zone and those championing an open, free, secure, and global Internet. Yet auDA oversteps its focus when addressing the wholesale domain industry, ostensibly establishing a strategic direction intended to obviate the need for its registrar network. For example, it aims to '[p]artner to develop and deliver website security tools and solutions for Internet users,' which are precisely the services that auDA registrars (and their resellers, where applicable) offer to auDA registrants. auDA's decision to proceed in this direction indicates an intent to take business away from its registrar partners.

auDA additionally appears not to support its registrar partners that use reseller networks to provide .au domains to their customers: resellers are not in a direct relationship with auDA, but a number of auDA initiatives are aimed directly at ‘the .au registry, registrars and resellers’. Domain resellers are outside the scope of auDA’s contracts and they must not be included in its strategic goals.

In the latest policy revisions, auDA pushed a number of complex and costly changes to registrars rather than supporting these changes directly in its own systems. When auDA then highlights its improvements to trust and security in the .au zone, it leaves the impression that auDA is using registrar resources for the benefit of its own public relations. Specifically, auDA ‘aims to support registry, registrars and resellers with training, validation technology and auditing’ but has not implemented these changes in its *own* systems; rather, requiring each registrar to develop their own implementation. Accordingly, auDA has pushed costly and difficult-to-implement requirements onto registrars and, where applicable, their reseller network, and created a time-consuming and burdensome audit process. Should auDA again consider amending or introducing new security, validation, or trust features into the .au zone, Tucows must insist that the technical and financial burden of these changes be borne primarily by auDA directly. The burden should only be placed on registrars after extensive consultation and agreement with those registrars.

2. Will auDA’s proposed strategic projects adequately ensure it delivers on its proposed strategic vision by 2025?

auDA proposes laudable goals, especially in the realm of DNS Abuse. However, the proposed strategic vision requires that auDA reinvent the wheel rather than work with the DNS industry—including its registrar partners—directly. For example, auDA mentions AI and partnering with the industry to address DNS Abuse, but does not describe the form or means by which ‘artificial intelligence’ will help auDA combat DNS Abuse. Furthermore, there is no discussion of tried and true means of combating DNS Abuse known and well-used within the industry, such as trusted notifiers. Despite auDA’s assurances that it will ‘partner with the industry’, it includes no specifics on how these partnerships will be selected, vetted, or reviewed.

Tucows strongly recommends that auDA sign onto [The Framework to Address Abuse \(‘DNS Abuse Framework’\)](#), an industry-led framework created by registrars and registries in 2019. auDA cannot act alone in this regard but needs to find shared definitions and policies with its registrars and the DNS community. Signing onto the DNS Abuse Framework would be an important step in that regard.

Another laudable goal the proposed 2021–25 Strategy establishes is its aim to ‘[g]row and diversify auDA’s membership’. Tucows notes that its broad channel of resellers is an example of just the type of diversity auDA seeks in the proposed 2021–25 Strategy: Tucows represents resellers with a wide range of business models, services, and size. We take pride in serving a variety of businesses - from large website builders and telecommunication companies to entrepreneurs creating highly customized website solutions for their customers. In order to do this well, we must simplify the domain lifecycle management in such a way that not only meets the registry’s requirements but still caters to the needs of the full breadth of our reseller channel. Our solution is

therefore not a one-size-fits-all system. We believe this is more in line with what auDA is hoping to achieve in its goals as outlined in the proposed 2021–25 Strategy.

Tucows backs auDA in increasing diversity and inclusion in the .au zone and will continue to do so in supporting the diversity of our reseller channel. Yet we also call on auDA to consider whether past and planned projects adequately deliver on this strategic vision. Our view is that the current strategy does the opposite: domain registrations are limited not just to registrants with an Australian nexus but may only be made through registrar organisations established in Australia. This *necessarily* limits the possible diversity in the namespace. Combined with the costly and complex requirements pushed onto registrars, the proposed 2021–25 Strategy ensures that only large players could possibly afford to implement auDA’s policies adequately, in accordance with the strict terms of its contracts. ‘Diversity’ under these conditions would either require enormous effort from smaller registrars or require auDA to enforce its contracts differently based on a registrar’s size or means. Neither option is inclusive or promotes diversity.

Tucows commends auDA for recognizing its mandate to build diversity and inclusion in its community, operations, and business. This area of focus requires dedicated work to improve accessibility to online services and remove barriers, review job postings to ensure the widest possible range of applicants, revise hiring practises to create a more level playing field, create paths to participation in the domain industry and internet policy-making from marginalised groups, and to identify and address historical wrongs that continue to divide and marginalize to this day. Building diversity and inclusion will indeed require auDA to look within its membership—but also requires auDA to reach outside of its current membership—when developing tailored initiatives that proactively remove barriers to participation.

3. Will auDA’s proposed 2021-25 Strategy support it to deliver on its unique role in the global domain name and Internet ecosystem?

auDA’s unique role in the global domain and Internet ecosystem provides it with an opportunity to support a global network of registrar partners; yet the 2021–25 Strategy only partly succeeds in that. It does *not* support its registrar partners that use reseller networks to provide .au domains to their customers: resellers are not in a direct relationship with auDA, but a number of auDA initiatives are aimed directly at ‘the .au registry, registrars and resellers’. This is outside the scope of auDA’s contracts and must not be included in their strategic goals.

4. Will auDA’s proposed strategic capabilities adequately support the organisation to deliver on its proposed strategic purpose and vision by 2025?

Tucows supports auDA’s efforts to address DNS Abuse and views this as an important component of building and maintaining trust in the .au namespace. However, in the matter of DNS Abuse, auDA’s efforts alone will not allow it to deliver on its proposed strategic purpose and vision. To carry these out, Tucows encourages auDA to work directly with its registrar partners—and the wider DNS industry—to further develop its work in mitigating DNS Abuse. Registrars and registries from across the domain name industry have already drafted [The Framework to Address Abuse \(‘DNS Abuse Framework’\)](#) and Tucows encourages auDA to sign onto this industry-led framework.

Rather than taking a singular approach, Tucows calls on auDA to align its DNS Abuse definitions, initiatives, and policies with its registrars, other registries, and the DNS community.

Tucows has additional concerns about an omitted objective of ‘scalability’ in auDA’s proposed project to build ‘trust’. auDA identified three objectives in its strategic project of building trust, namely addressing DNS Abuse, driving up the integrity of the .au domain, and driving the world’s best-practise security. While these initiatives will undoubtedly help increase trust, Tucows feels that these initiatives alone are not sufficient to deliver on auDA’s proposed strategic purpose and vision. In our view, a missing component to building trust is promoting the scalability of auDA’s systems and policies. We highlight both because the development of policies and of technical systems is intertwined. It is essential to consider these separately and together in ensuring the scalability of the .au zone. Put simply, if scalability is not considered in auDA’s short- and long-term strategy, auDA risks undermining trust in the .au zone.

Scalable policies:

The policy changes that auDA introduced in 2020 resulted in a complex set of requirements for domain name eligibility, administration, and validation. The licencing rules may have consolidated requirements across a number of TLDs, but they hardly simplified them. In fact, from the perspective of domain resellers and registrants, the rules were difficult to understand and implement and undeniably punished legitimate domain registrants who had the misfortune of no longer meeting the stricter licencing and eligibility requirements. Tucows’ reseller channel ranges in scale from some of the largest players in the industry to sole proprietorships; we challenge auDA to set policies that are simple to understand and implement across a diverse range of organisations and individual users.

In our business experience, domain zones with complex and narrow eligibility requirements are more difficult to sell and therefore more difficult to scale. Our aim is to scale up our .au business over the coming years—we do not consider this aim to be incompatible with, but rather see it as inseparable from, the goal of building trust in the zone.

Scalable systems:

When making policy decisions, Tucows advises auDA to recognize the ramifications that their licencing and eligibility requirements have on auDA’s and on registrars’ technical systems. Policy decisions unquestionably have technical implications that can affect the overall scalability of the zone. A system that falters in scalability does not induce trust.

A concrete example of this can be found in the validation requirements introduced by auDA in 2020. Under the Domain Administration Rules, registrars are required to validate that registrant details ‘are an exact match to the record of Reliable and Independent Electronic Data or valid identity document.’ In introducing this policy, auDA placed the burden of validation on registrars, without providing registrars with access to a reliable and high-availability electronic validation tool. This leaves registrars to either turn to manual validation of identity documents (which can neither be scalable nor highly available) or to build automated connections to public databases. This increases the number of automated connections which registrars must build and maintain in addition to their automated integration with auDA. Furthermore, the available public databases are

not designed or managed to be used by high-volume, critical systems dependent on rapid responses and predictable availability. Neither manual validation of a registrant's identity nor an unconsidered reliance on these public tools can be scaled in a manner that ensures the continued reliability and availability of registrar and registry services. Without ensuring reliability and availability, there can be no trust.

Tucows looks forward to continued participation in the development of auDA's strategy over the coming years. Strategy development is at its best when it is an ongoing conversation. While auDA's strategic goals must be unique to the Australian space, we call on auDA to remain cognisant of its global context and the demands that context places on both auDA and its registrar partners. We encourage a lasting two-way conversation between auDA and its contractual partners—its registrars—in the best interests of the Australian public, the wider stakeholders of the internet community, and the registrants we all serve.

We commend auDA for soliciting feedback on its 2021–2025 Proposed Strategy from its registrar network. We see this as a clear step in the right direction and we thank you for both requesting and considering our feedback.

Best regards,



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Tucows Inc.

cc: Rosemary Sinclair AM, CEO, .au Domain administration (auDA)
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